Sent: Thursday, April 02, 2015 6:44 AM

To: Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John;

Michelle Josilo; Hannafin, Juliet; Haskell, Daniel; Lee, Bill

Cc: Morimoto, Kaoru; Liu, Chun; Christophe, Liliana

Subject: April Monthly Reports

Attachments: CA Permit Summary Report (PSTS).xls; R9 - WTR5 Monthly Permit Status Summary

Report.xlsx; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; Tribal EPA Issued Permits

Tracker.xlsx

Attached are the monthly reports for April.

Please note that HI Inventory report for "Minor SW" and "Minor Non-SW" are not accurate. HDOH has not responded to the inaccuracy of the data but are aware of the problem.

For Water NPDES Permit office, please review your State/Tribe reports and let me know if you have any questions. Thanks.

SANDRA CHEW

U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

From: Sablad, Elizabeth

Sent: Tuesday, February 24, 2015 2:12 PM
To: Darryl C Lum; Scott S Miyashiro; LIU, CHUN

Subject: For ICIS call today

Attachments: HI State Issued Permit Inventory.xlsx

Hi All,

Attached is a report from ICIS that I use to track permit issuance. In today's call, I will be referring to this report, so I thought you all should have it.

Talk to you soon! -Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-2-3) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

Sent: Wednesday, February 04, 2015 6:52 AM

To: Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson,

Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty,

Fatima

Cc: Morimoto, Kaoru; Liu, Chun; Christophe, Liliana

Subject: February - Monthly Report

Attachments: CA Permit Summary Report (PSTS).xls; R9 - WTR5 Monthly Permit Status Summary

Report.xlsx; List of Monthly ICIS-NPDES Rpts.xlsx; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State

Issued Permits - Non-Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued

Permits Tracker.xlsx; Tribal EPA Issued Permits Tracker.xlsx

Attached are the February monthly reports. Please review for any discrepancies and contact me if you have any questions.

SANDRA CHEW

U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

Sent: Tuesday, January 06, 2015 7:14 AM

To: Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson,

Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty,

Fatima

Cc: Morimoto, Kaoru; Liu, Chun; Christophe, Liliana

Subject: January Monthly Report

Attachments: R9 - WTR5 Monthly Permit Status Summary Report.xlsx; CA Permit Summary Report

(PSTS).xls; EPA Issued Permits Expiring in 9 Months.xlsx; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued

Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit

Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-

Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; Tribal

EPA Issued Permits Tracker.xlsx

Hi Everyone,

Happy New Years! Attached are the monthly reports for January. Let me know if you have any questions.

SANDRA CHEW

U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

From: Kunishima, Bree Bree.Kunishima@doh.hawaii.gov

Sent: Tuesday, December 23, 2014 10:48 AM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: NPDES Transmittal Letter Regarding Biomass Measurement -HI 0020877 Honouliuli

Wastewater Treatment Plant

Attachments: 20141223.Transmittal Letter for Biomass Measurement-HI 0020877.PDF

Please see attached document for your files.

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at (808) 586-4309.

Thank you,

Bree

Sent: Friday, December 05, 2014 6:01 PM

To: Sablad, Elizabeth

Cc:darryl.lum@doh.hawaii.govSubject:Correcting an error in a permit

Hi Elizabeth,

It was nice seeing you a couple of weeks ago. I hope you had a great Thanksgiving! For the Honouliuli permit, we used requirements from the old Sand Island permit for benthic monitoring. In this section, we required that the biomass be taken. However, the EPA later wrote a letter to the City for the old Sand Island permit saying that they didn't need to take the biomass measurements due to another EPA document discouraging the practice. Is it ok for us to write a letter telling the City that they don't need to measure biomass since the EPA had done it in the past? We omitted this requirement in the new Sand Island permit. Thanks for your help!

Sent: Wednesday, December 03, 2014 11:12 AM

To: Smith, DavidW; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric;

PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John

Cc: Morimoto, Kaoru; Liu, Chun; Christophe, Liliana

Subject: December Monthly Report

Attachments: R9 - WTR5 Monthly Permit Status Summary Report.xlsx; AZ State Issued Permit

Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued

Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly

issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-Tribal.xlsx; NV State Issued Permits

Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; Tribal EPA Issued Permits Tracker.xlsx

Attached are the monthly reports for December. Please contact me if you have any questions.

SANDRA CHEW

U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

Subject: Assistance on Kailua dilution study review

Location: R9-Room-2209-20

Start: Tue 12/2/2014 10:00 AM **End:** Tue 12/2/2014 11:00 AM

Recurrence: (none)

Meeting Status: Meeting organizer

Organizer: Sablad, Elizabeth

Required Attendees: Lum, Darryl C; Mues, Pascal

Optional Attendees: Smith, DavidW Resources: R9-Room-2209-20

Hi All,

Please hold for our discussion regarding the review of the Kailua dilution study.

-Elizabeth

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Thursday, November 20, 2014 3:34 PM

To: Sablad, Elizabeth

Subject: RE: Assistance on Kailua dilution study review

Hi Elizabeth,

Yes. I'm free the entire week except for 12/4/14 (9am to 11 am HI time).

This is perfect timing. The CCH wanted to meet with us regarding the dilution study for Kailua and Honouliuli.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, November 20, 2014 1:27 PM

To: Lum, Darryl C

Subject: Assistance on Kailua dilution study review

Hi Darryl,

Will you have time available for a conference call the week of December 1^{st} on reviewing the Kailua dilution study? We should have something ready by then. Let me know when you're available.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-2-3) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov From: Lum, Darryl C <arryl.lum@doh.hawaii.gov>
Sent: Thursday, November 20, 2014 3:34 PM

To: Sablad, Elizabeth

Subject: RE: Assistance on Kailua dilution study review

Hi Elizabeth,

Yes. I'm free the entire week except for 12/4/14 (9am to 11 am HI time).

This is perfect timing. The CCH wanted to meet with us regarding the dilution study for Kailua and Honouliuli.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, November 20, 2014 1:27 PM

To: Lum, Darryl C

Subject: Assistance on Kailua dilution study review

Hi Darryl,

Will you have time available for a conference call the week of December 1st on reviewing the Kailua dilution study? We should have something ready by then. Let me know when you're available.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-2-3) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

Sent: Wednesday, November 05, 2014 8:31 AM

To: Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty,

Fatima

Cc: Morimoto, Kaoru; Liu, Chun; Christophe, Liliana

Subject: November - Water Monthly Reports

Attachments: R9 - WTR5 Monthly Permit Status Summary Report.xlsx; CA Permit Summary Report

(PSTS).xls; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; Tribal EPA Issued Permits

Tracker.xlsx

Attached are the monthly reports for November. Please let me know if there are any discrepancies. Thanks.

SANDRA CHEW

U.S. EPA REGION 9
INFORMATION MANAGEMENT SECTION, ENF-4-1
75 HAWTHORNE STREET
SAN FRANCISCO, CA 94105
(415) 972-3335

Kunishima, Bree Sree.Kunishima@doh.hawaii.gov From:

Wednesday, October 29, 2014 11:41 AM Sent:

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Poentis, Kris T Cc:

Minor Modifications of NPDES Permit for Honouliuli Wastewater Treatment Plant-HI 0020877 Subject: **Attachments:**

20141029. Transmittal Letter for Minor Modifications to Final Permit-HI0020877. PDF;

20141029.Modified Pages of Permit-HI0020877.PDF

Please see Attached Documents for your files.

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at (808) 586-4309.

-Bree

Sent: Tuesday, October 07, 2014 11:15 AM

To: Sablad, Elizabeth

Subject: Update HI Permit Tracking Report #3
Attachments: HI State Issued Permit Inventory 10-7.xlsx

I've taken out all the NGPC from tab 5. Now there is a total of 48. Hope that sounds more accurate. I was trying to find the MGP with pesticide but couldn't locate it. If you had the Permit #, would you pass it on? Thanks.

Sandra Chew

US EPA Region 9 - Enf-4-1 75 Hawthorne Street San Francisco, CA 94105 Phone: 415-972-3335

Sent: Tuesday, October 07, 2014 9:07 AM

To: Sablad, Elizabeth

Subject: Revised HI Inventory Report #2

Attachments: HI State Issued Permit Inventory 10-7.xlsx

See attachment for report #2. I've added the UDF and Component Type Desc field to the report for tab 5- HI Minor SW and removed the MS4. Let me know if I should filter out more.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

Sent: Tuesday, October 07, 2014 8:44 AM

To: Sablad, Elizabeth Subject: Revised HI Report

Attachments: HI State Issued Permit Inventory 10-7.xlsx

Elizabeth,

Attach is a revised HI State Issued Permit Inventory report. The tab for the Minor Non-SW and the HI Minor SW should be correct now. The only questionable ones were the five "HIS" permit numbers I sent to Scott and cc'd you.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105
Phone: 415-972-3335

Sent: Monday, October 06, 2014 8:49 AM

To: Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola,

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson,

Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty,

Fatima

Cc: Morimoto, Kaoru

Subject: October Monthly Reports

Attachments: CA Permit Summary Report (PSTS).xls; R9 - WTR5 Monthly Permit Status Summary

Report.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; AZ State Issued Permit

Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-Tribal.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; Tribal EPA Issued

Permits Tracker.xlsx

All,

Attached are your monthly reports for October.

Please note:

- HI State Issued Permit Inventory report, "HI Minor Non-SW" tab is still showing SW permits due to the batch HI is sending to ICIS. They are missing a component that still needs to be corrected. We are working with HI to resolve this issue.

Sandra Chew US EPA Region 9 - Enf-4-1

75 Hawthorne Street San Francisco, CA 94105

Phone: 415-972-3335

From: Sablad, Elizabeth

Sent: Tuesday, September 16, 2014 2:05 PM

To: Rao, kate Subject: letters

Attachments: EPA Comments on HAR revisions_Sep 2014.pdf; EPA Comments on Honouliuli WWTP.pdf

Hi Kate,

See the attached letters as examples.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-2-3) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

Chew, Sandra From:

Wednesday, September 03, 2014 7:08 AM Sent:

Wampler, David; Bromley, Eugene; Kozelka, Peter; Fondahl, Lauren; Honor, Lisa; Marincola, To:

JamesPaul; Mitschele, Becky; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tran, Linh; Whitson, Amelia; Greenberg, Ken; Howell, Adam; Karlson,

Kristine; Magnan, Eric; PERKINS, SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty,

Fatima

Morimoto, Kaoru Cc:

Water Monthly Reports Subject:

Attachments: R9 - WTR5 Monthly Permit Status Summary Report.xlsx; AZ State Issued Permit

> Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued

Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly

issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-Tribal.xlsx; NV State Issued Permits

Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; Tribal EPA Issued Permits Tracker.xlsx

All,

Attached are your monthly reports for September.

Please note:

- In the HI State Issued Permit Inventory report, "HI Minor Non-SW" tab is still showing SW permits due to the batch HI is sending to ICIS. They are missing a component that still needs to be corrected. We are working with HI to resolve this issue.
- The PSTS report is missing due to an error. I've already notified the contractor. If you need this report, please let me know and I will run it again when the issue has been resolved.

Sandra Chew

US EPA Region 9 - Enf-4-1 **75 Hawthorne Street** San Francisco, CA 94105

Phone: 415-972-3335

From: Sablad, Elizabeth

Sent: Tuesday, September 02, 2014 2:44 PM

To: Lum, Darryl C

Subject: RE: Dilution Study Training and Assistance

Hi Darryl,

We are working with HQ to put together a training for our region, but I'm not sure of the timeframe yet. Maybe you could contract out review of these specific studies?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Tuesday, September 02, 2014 9:38 AM

To: Sablad, Elizabeth

Subject: Dilution Study Training and Assistance

Hi Elizabeth,

We wanted to find out if there was any progress on the dilution study training and assistance.

Sorry to bug you about this. The City and County of Honolulu is asking about their dilution studies for the Kailua and Honouliuli contested cases.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Lum, Darryl C <u><darryl.lum@doh.hawaii.gov></u>
Sent: Tuesday, September 02, 2014 9:38 AM

To: Sablad, Elizabeth

Subject: Dilution Study Training and Assistance

Hi Elizabeth,

We wanted to find out if there was any progress on the dilution study training and assistance.

Sorry to bug you about this. The City and County of Honolulu is asking about their dilution studies for the Kailua and Honouliuli contested cases.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sent: Thursday, August 07, 2014 12:08 PM

To: Sablad, Elizabeth

 Cc:
 darryl.lum@doh.hawaii.gov

 Subject:
 RE: Revised Sand Island WWTP

Hi Elizabeth,

I made the changes for #1 and #2, but kept the entero monthly geomean limit the same because for the Honouliuli permit, the maximum and second highest concentrations were considered to be too high and thus the percentiles were used. It seems that the same methodology was followed, except that for the Sand Island, the second highest concentration seemed to be reasonable and thus was used as a limit. Thanks for your quick comments!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, August 7, 2014 6:11 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Revised Sand Island WWTP

Hi Kris,

- 1. Regarding my first comment, please make the following language changes on page 5:
 - a. The Permittee shall immediately comply with the maximum daily limitation for enterococcus. The Permittee shall maintain compliance with the following interim monthly geometric mean effluent limitation for enterococcus at Outfall Serial No. 001. The interim monthly geometric mean effluent limitation for enterococcus shall be effective from the effective date of this permit until December 31, 2038 June 30, 2024.
- 2. The permit is missing the EPA Pretreatment Coordinator reporting address for the annual report. Please include.
- 3. I also want to bring to your attention the fact that the monthly geomean and daily maximum interim limits for enterococcus in the Honouliuli permit were based on the 95th and 99th percentiles, respectively, so it may be more consistent to calculate the monthly geomean interim limit in this permit based on the 95th percentile.

Thanks, Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: REvised Sand Island WWTP

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments. Please let us know if its ok and we will send it out for public notice. Thanks!

Kris

Sent: Thursday, August 07, 2014 12:08 PM

To: Sablad, Elizabeth

 Cc:
 darryl.lum@doh.hawaii.gov

 Subject:
 RE: Revised Sand Island WWTP

Hi Elizabeth,

I made the changes for #1 and #2, but kept the entero monthly geomean limit the same because for the Honouliuli permit, the maximum and second highest concentrations were considered to be too high and thus the percentiles were used. It seems that the same methodology was followed, except that for the Sand Island, the second highest concentration seemed to be reasonable and thus was used as a limit. Thanks for your quick comments!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, August 7, 2014 6:11 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Revised Sand Island WWTP

Hi Kris,

- 1. Regarding my first comment, please make the following language changes on page 5:
 - a. The Permittee shall immediately comply with the maximum daily limitation for enterococcus. The Permittee shall maintain compliance with the following interim monthly geometric mean effluent limitation for enterococcus at Outfall Serial No. 001. The interim monthly geometric mean effluent limitation for enterococcus shall be effective from the effective date of this permit until December 31, 2038 June 30, 2024.
- 2. The permit is missing the EPA Pretreatment Coordinator reporting address for the annual report. Please include.
- 3. I also want to bring to your attention the fact that the monthly geomean and daily maximum interim limits for enterococcus in the Honouliuli permit were based on the 95th and 99th percentiles, respectively, so it may be more consistent to calculate the monthly geomean interim limit in this permit based on the 95th percentile.

Thanks, Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: REvised Sand Island WWTP

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments. Please let us know if its ok and we will send it out for public notice. Thanks!

Kris

Sent: Thursday, August 07, 2014 10:09 AM

To: Sablad, Elizabeth

Subject: RE: Revised Sand Island WWTP

Thanks Elizabeth! I will make the corrections and start the public notice procedures.

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, August 7, 2014 6:11 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Revised Sand Island WWTP

Hi Kris,

- 1. Regarding my first comment, please make the following language changes on page 5:
 - a. The Permittee shall immediately comply with the maximum daily limitation for enterococcus. The Permittee shall maintain compliance with the following interim monthly geometric mean effluent limitation for enterococcus at Outfall Serial No. 001. The interim monthly geometric mean effluent limitation for enterococcus shall be effective from the effective date of this permit until December 31, 2038 June 30, 2024.
- 2. The permit is missing the EPA Pretreatment Coordinator reporting address for the annual report. Please include.
- 3. I also want to bring to your attention the fact that the monthly geomean and daily maximum interim limits for enterococcus in the Honouliuli permit were based on the 95th and 99th percentiles, respectively, so it may be more consistent to calculate the monthly geomean interim limit in this permit based on the 95th percentile.

Thanks, Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov Subject: REvised Sand Island WWTP

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments.	Please let us know if its ok and we
will send it out for public notice. Thanks!	
Kris	

Sent: Thursday, August 07, 2014 10:09 AM

To: Sablad, Elizabeth

Subject: RE: Revised Sand Island WWTP

Thanks Elizabeth! I will make the corrections and start the public notice procedures.

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, August 7, 2014 6:11 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Revised Sand Island WWTP

Hi Kris,

- 1. Regarding my first comment, please make the following language changes on page 5:
 - a. The Permittee shall immediately comply with the maximum daily limitation for enterococcus. The Permittee shall maintain compliance with the following interim monthly geometric mean effluent limitation for enterococcus at Outfall Serial No. 001. The interim monthly geometric mean effluent limitation for enterococcus shall be effective from the effective date of this permit until December 31, 2038 June 30, 2024.
- 2. The permit is missing the EPA Pretreatment Coordinator reporting address for the annual report. Please include.
- 3. I also want to bring to your attention the fact that the monthly geomean and daily maximum interim limits for enterococcus in the Honouliuli permit were based on the 95th and 99th percentiles, respectively, so it may be more consistent to calculate the monthly geomean interim limit in this permit based on the 95th percentile.

Thanks, Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov Subject: REvised Sand Island WWTP

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments.	Please let us know if its ok and we
will send it out for public notice. Thanks!	
Kris	

From: Sablad, Elizabeth

Sent: Thursday, August 07, 2014 9:11 AM

To: Poentis, Kris T

 Cc:
 darryl.lum@doh.hawaii.gov

 Subject:
 RE: Revised Sand Island WWTP

Hi Kris,

- 1. Regarding my first comment, please make the following language changes on page 5:
 - a. The Permittee shall immediately comply with the maximum daily limitation for enterococcus. The Permittee shall maintain compliance with the following interim monthly geometric mean effluent limitation for enterococcus at Outfall Serial No. 001. The interim monthly geometric mean effluent limitation for enterococcus shall be effective from the effective date of this permit until December 31, 2038 June 30, 2024.
- 2. The permit is missing the EPA Pretreatment Coordinator reporting address for the annual report. Please include.
- 3. I also want to bring to your attention the fact that the monthly geomean and daily maximum interim limits for enterococcus in the Honouliuli permit were based on the 95th and 99th percentiles, respectively, so it may be more consistent to calculate the monthly geomean interim limit in this permit based on the 95th percentile.

Thanks, Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov
Subject: REvised Sand Island WWTP

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments. Please let us know if its ok and we will send it out for public notice. Thanks!

Kris

Sent: Wednesday, August 06, 2014 6:20 PM

To: Sablad, Elizabeth

Cc:darryl.lum@doh.hawaii.govSubject:REvised Sand Island WWTP

Attachments: Sand Island WWTP 9-16-13 Permit - no comments.doc; Sand Island WWTP 9-16-13 Fact

Sheet-no comments.doc; Response to ES Comments on July 2014 draft permit for Sand

Island WWTP.doc

Hi Elizabeth,

Attached are the revised permit and fact sheet, and our response to your comments. Please let us know if its ok and we will send it out for public notice. Thanks!

Kris

Sent: Tuesday, August 05, 2014 7:11 AM

To: Smith, DavidW; Bromley, Eugene; Kozelka, Peter; Marincola, JamesPaul; Mues, Pascal;

Sablad, Elizabeth; Fondahl, Lauren; Sheth, Gary; Stuber, Robyn; Tran, Linh; Whitson, Amelia; Mitschele, Becky; Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric; PERKINS,

SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty, Fatima; Wampler, David

Cc: Morimoto, Kaoru

Subject: August Monthly Reports

Attachments: List of Monthly ICIS-NPDES Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 - WTR5

Monthly Permit Status Summary Report.xlsx; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued

Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State

Issued Permits - Non-Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued

Permits Tracker.xlsx; Tribal EPA Issued Permits Tracker.xlsx

Attach are the August Monthly reports. Let me know If you have any questions.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

Sent: Wednesday, July 30, 2014 9:48 AM

To: Sablad, Elizabeth

Subject: RE: chlordane/dieldrin for Sand Island

Thanks for your help Elizabeth!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, July 30, 2014 4:49 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: chlordane/dieldrin for Sand Island

Hi Kris,

For DDT, it appears they can meet the limits, so a compliance schedule is not appropriate.

For chlordane, they cannot meet the annual average limit; however, this limit is less stringent than the previous permit limit, so a compliance schedule may not be appropriate – usually compliance schedules are only allowed for a new or more stringent limit.

For dieldrin, a compliance schedule may be appropriate for the more stringent annual average limit; however, the length of that schedule needs to be analyzed and I'm not sure it would be appropriate to allow a schedule as long as the consent decree.

On enterococcus, yes, it can be different. Refer to my previous email.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, July 29, 2014 7:14 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: chlordane/dieldrin for Sand Island

Hi Elizabeth,

Besides the issue about the single sample maximum vs. maximum daily below, according to the City's data, they cannot meet the new annual average limitation for chlordane and dieldrin. For DDD/DDE/DDT, they have been reporting 0 (non detect?) for the last 3 years. Should we give them a compliance schedule for chlordane and dieldrin that corresponds to the consent decree since that is when the I&I should be fixed? If we were to give them compliance schedules, what would be their interim limits? For chlordane, their previous limit was lower than the proposed. For dieldrin, although their previous limit was higher, they have not been meeting that limit either.

Regarding the enterococcus limit being consistent with Honouliuli, Honouliuli was given a performance-based single-sample maximum. According to the previous fact sheet, the 18,000 daily maximum is based on average dilution, so since the limitation has a different basis, would it be okay for it to be a different type of limitation? Thanks!

Kris

From: Poentis, Kris T

Sent: Tuesday, July 29, 2014 10:59 AM

To: Elizabeth Sablad (Sablad.Elizabeth@epamail.epa.gov)

Cc: Lum, Darryl C (darryl.lum@doh.hawaii.gov)

Subject: maximum daily discharge

Hi Elizabeth,

Thank you for discussing your Sand Island permit comments with us. Just to be certain about the maximum daily discharge limitation for enterococcus, I checked 40 CFR 122.2 and the definitions are as follows:

Maximum daily discharge limitation means the highest allowable "daily discharge."

Daily discharge means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily "discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

The enterococcus limitation in the previous permit is a maximum daily discharge of 18,000 cfu. Should we still change it to a single sample maximum and would it be easy to justify? The previous fact sheet says "The EPA believes that given the low probability of impact to nearshore areas from the Sand Island discharge, a discharge limitation of 18,000 CFU/100 ml, based on average dilution assumptions when the plume is surfacing or trapped, will ensure that the Sand Island discharge will not adversely impact marine recreational waters of Mamala Bay. This discharge limitation will also ensure that the disinfection facility will be operated."

Thanks! Kris From: Sablad, Elizabeth

Sent: Wednesday, July 30, 2014 7:49 AM

To: Poentis, Kris T

Cc: <u>darryl.lum@doh.hawaii.gov</u>

Subject: RE: chlordane/dieldrin for Sand Island

Hi Kris,

For DDT, it appears they can meet the limits, so a compliance schedule is not appropriate.

For chlordane, they cannot meet the annual average limit; however, this limit is less stringent than the previous permit limit, so a compliance schedule may not be appropriate – usually compliance schedules are only allowed for a new or more stringent limit.

For dieldrin, a compliance schedule may be appropriate for the more stringent annual average limit; however, the length of that schedule needs to be analyzed and I'm not sure it would be appropriate to allow a schedule as long as the consent decree.

On enterococcus, yes, it can be different. Refer to my previous email.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, July 29, 2014 7:14 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: chlordane/dieldrin for Sand Island

Hi Elizabeth,

Besides the issue about the single sample maximum vs. maximum daily below, according to the City's data, they cannot meet the new annual average limitation for chlordane and dieldrin. For DDD/DDE/DDT, they have been reporting 0 (non detect?) for the last 3 years. Should we give them a compliance schedule for chlordane and dieldrin that corresponds to the consent decree since that is when the I&I should be fixed? If we were to give them compliance schedules, what would be their interim limits? For chlordane, their previous limit was lower than the proposed. For dieldrin, although their previous limit was higher, they have not been meeting that limit either.

Regarding the enterococcus limit being consistent with Honouliuli, Honouliuli was given a performance-based single-sample maximum. According to the previous fact sheet, the 18,000 daily maximum is based on average dilution, so since the limitation has a different basis, would it be okay for it to be a different type of limitation? Thanks!

Kris

From: Poentis, Kris T

Sent: Tuesday, July 29, 2014 10:59 AM

To: Elizabeth Sablad (Sablad.Elizabeth@epamail.epa.gov)

Cc: Lum, Darryl C (darryl.lum@doh.hawaii.gov)

Subject: maximum daily discharge

Hi Elizabeth,

Thank you for discussing your Sand Island permit comments with us. Just to be certain about the maximum daily discharge limitation for enterococcus, I checked 40 CFR 122.2 and the definitions are as follows:

Maximum daily discharge limitation means the highest allowable "daily discharge."

Daily discharge means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily "discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

The enterococcus limitation in the previous permit is a maximum daily discharge of 18,000 cfu. Should we still change it to a single sample maximum and would it be easy to justify? The previous fact sheet says "The EPA believes that given the low probability of impact to nearshore areas from the Sand Island discharge, a discharge limitation of 18,000 CFU/100 ml, based on average dilution assumptions when the plume is surfacing or trapped, will ensure that the Sand Island discharge will not adversely impact marine recreational waters of Mamala Bay. This discharge limitation will also ensure that the disinfection facility will be operated."

Thanks! Kris

Sent: Tuesday, July 29, 2014 7:14 PM

To: Sablad, Elizabeth

Cc:darryl.lum@doh.hawaii.govSubject:chlordane/dieldrin for Sand Island

Hi Elizabeth,

Besides the issue about the single sample maximum vs. maximum daily below, according to the City's data, they cannot meet the new annual average limitation for chlordane and dieldrin. For DDD/DDE/DDT, they have been reporting 0 (non detect?) for the last 3 years. Should we give them a compliance schedule for chlordane and dieldrin that corresponds to the consent decree since that is when the I&I should be fixed? If we were to give them compliance schedules, what would be their interim limits? For chlordane, their previous limit was lower than the proposed. For dieldrin, although their previous limit was higher, they have not been meeting that limit either.

Regarding the enterococcus limit being consistent with Honouliuli, Honouliuli was given a performance-based single-sample maximum. According to the previous fact sheet, the 18,000 daily maximum is based on average dilution, so since the limitation has a different basis, would it be okay for it to be a different type of limitation? Thanks!

Kris

From: Poentis, Kris T

Sent: Tuesday, July 29, 2014 10:59 AM

To: Elizabeth Sablad (Sablad. Elizabeth@epamail.epa.gov)

Cc: Lum, Darryl C (darryl.lum@doh.hawaii.gov)

Subject: maximum daily discharge

Hi Elizabeth,

Thank you for discussing your Sand Island permit comments with us. Just to be certain about the maximum daily discharge limitation for enterococcus, I checked 40 CFR 122.2 and the definitions are as follows:

Maximum daily discharge limitation means the highest allowable "daily discharge."

Daily discharge means the "discharge of a pollutant" measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily "discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

The enterococcus limitation in the previous permit is a maximum daily discharge of 18,000 cfu. Should we still change it to a single sample maximum and would it be easy to justify? The previous fact sheet says "The EPA believes that given the low probability of impact to nearshore areas from the Sand Island discharge, a discharge limitation of 18,000 CFU/100 ml, based on average dilution assumptions when the plume is surfacing or trapped, will ensure that the Sand Island discharge will not adversely impact marine recreational waters of Mamala Bay. This discharge limitation will also ensure that the disinfection facility will be operated."

Thanks!

Kris

Sent: Monday, July 28, 2014 3:21 PM

To: Poentis, Kris T

Cc:darryl.lum@doh.hawaii.gov;Greenberg, Ken; Polek, JimSubject:Comments on pre-public notice Sand Island WWTP permitAttachments:Comments on July 2014 draft permit for Sand Island WWTP.doc

Hi Kris,

Attached are our comments on the draft permit. They include comments from our Enforcement Division, who oversee the Consent Decree. Let me know when you're available to discuss them. Thanks!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, July 15, 2014 12:56 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: Sand Island WWTP public notice permit

Hi Elizabeth,

Please review the attached draft public notice permit and fact sheet. The previous draft was revised based on your comments. Please also note that we will be adding in Regional Monitoring Requirements in the Special Conditions section based on a conference call Alec, Watson and Darryl had with Janet Hashimoto. They are also proposing to add the Regional Monitoring Requirements to the City's MS4 permit. Thanks!

Sent: Monday, July 21, 2014 12:11 PM

To: Roser, Sara

Subject: FW: FY15 Contractor Support Permits

Attachments: 20140721 FY2015 PERMIT ISSUANCE SCHEDULE.docx

Hi Sara,

See updated permit issuance schedule for FY15 attached. Darryl just made one adjustment.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Monday, July 21, 2014 11:53 AM

To: Sablad, Elizabeth

Subject: FY15 Contractor Support Permits

Hi Elizabeth,

We would like the following permits for FY15 contractor support:

- 1. Kahala Hotel & Resort (HI 0021300)
- 2. Honolulu Marine LLC (HI 0021835)
- 3. Agribusiness Development Corporation (HI 0000086)
- 4. Sunrise Capital, Inc. (HI 0021654)
- 5. Lanai Oil Company, Inc. (HI 0020958)

Also, I moved Topa Financial Center (HI0021768) from FY16 to FY15. I moved Marisco, Ltd. (HI0021786) from FY15 to FY16. Please see attached. I'm very sorry about this. Topa Financial Center expired 3/31/14. Marisco expires on 3/31/16 (renewal application due 10/2016, after FY15).

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Lum, Darryl C

Sent: Monday, July 21, 2014 11:53 AM

To: Sablad, Elizabeth

Subject: FY15 Contractor Support Permits

Attachments: 20140721 FY2015 PERMIT ISSUANCE SCHEDULE.docx

Hi Elizabeth,

We would like the following permits for FY15 contractor support:

- 1. Kahala Hotel & Resort (HI 0021300)
- 2. Honolulu Marine LLC (HI 0021835)
- 3. Agribusiness Development Corporation (HI 0000086)
- 4. Sunrise Capital, Inc. (HI 0021654)
- 5. Lanai Oil Company, Inc. (HI 0020958)

Also, I moved Topa Financial Center (HI0021768) from FY16 to FY15. I moved Marisco, Ltd. (HI0021786) from FY15 to FY16. Please see attached. I'm very sorry about this. Topa Financial Center expired 3/31/14. Marisco expires on 3/31/16 (renewal application due 10/2016, after FY15).

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sent: Wednesday, July 16, 2014 10:49 AM

To: Liu, Chun

Subject: FW: Honouliuli WWTP permit

Attachments: 0020877.FNL.14c.doc; 02069PKP.14a.doc

Hi Chun, FYI

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, July 16, 2014 10:15 AM

To: Sablad, Elizabeth

Subject: RE: Honouliuli WWTP permit

Hi Elizabeth,

Attached are the final documents.

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, July 16, 2014 6:26 AM

To: Poentis, Kris T **Cc:** Liu, Chun

Subject: Honouliuli WWTP permit

Hi Kris,

Since there are have been a couple of minor modifications, could you send me the complete, revised final permit and fact sheet? Thanks!

-Flizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Wednesday, July 16, 2014 10:15 AM

To: Sablad, Elizabeth

Subject: RE: Honouliuli WWTP permit

Attachments: 0020877.FNL.14c.doc; 02069PKP.14a.doc

Hi Elizabeth,

Attached are the final documents.

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, July 16, 2014 6:26 AM

To: Poentis, Kris T **Cc:** Liu, Chun

Subject: Honouliuli WWTP permit

Hi Kris,

Since there are have been a couple of minor modifications, could you send me the complete, revised final permit and fact sheet? Thanks!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

Sent: Wednesday, July 16, 2014 9:26 AM

To: Poentis, Kris T Cc: Liu, Chun

Subject: Honouliuli WWTP permit

Hi Kris,

Since there are have been a couple of minor modifications, could you send me the complete, revised final permit and fact sheet? Thanks!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov From: Chew, Sandra

Sent: Wednesday, July 02, 2014 7:32 AM

To: Smith, DavidW; Bromley, Eugene; Kozelka, Peter; Marincola, JamesPaul; Mues, Pascal;

Sablad, Elizabeth; Fondahl, Lauren; Sheth, Gary; Stuber, Robyn; Tran, Linh; Whitson, Amelia; Mitschele, Becky; Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric; PERKINS,

SUSANNE; Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty, Fatima

Cc:Morimoto, KaoruSubject:July Monthly Reports

Attachments: List of Monthly ICIS-NPDES Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 - WTR5

Monthly Permit Status Summary Report.xlsx; AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued

Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9 Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State

Issued Permits - Non-Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued

Permits Tracker.xlsx; Tribal EPA Issued Permits Tracker.xlsx

Attach are the July Monthly reports. Let me know If you have any guestions.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

From: Liu, Chun

Sent: Thursday, June 05, 2014 2:31 PM Chew, Sandra; Morimoto, Kaoru

Subject: June Monthly Reports

Attachments: AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CA Permit

Summary Report (PSTS).xls; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued

Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9

Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits)
All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; R9 - WTR5 Monthly Permit Status Summary Report.xlsx; Tribal EPA

Issued Permits Tracker.xlsx

Sandra is out of the office this week and asked that I run the monthly reports and distribute them to you.

The monthly reports were scheduled to run automatically this week, but failed due to problems with the Business Intelligence server. These reports were run manually and should be okay since there were few filter prompts.

If you have questions with the reports, please contact Sandra when she returns on Monday June 9th.

Chun Liu
U.S. EPA Region 9
Enforcement Division /Information

Enforcement Division/Information Management Section (ENF-4-1)

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415) 972-3333 Email: <u>liu.chun@epa.gov</u> From: Liu, Chun

Sent: Thursday, June 05, 2014 2:31 PM Chew, Sandra; Morimoto, Kaoru

Subject: June Monthly Reports

Attachments: AZ State Issued Permit Inventory.xlsx; AZ State Issued Permits Tracker.xlsx; CA Permit

Summary Report (PSTS).xls; CALIF Individual, MS4, and General Permits.xlsx; EPA Issued

Permits Crosstab, plus Tribal & Non-Tribal.xlsx; EPA Issued Permits Expiring in 9

Months.xlsx; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits)
All.xlsx; HI State Issued Permit Inventory.xlsx; HI State Issued Permits Tracker.xlsx; NV State Issued Permits - Non-Tribal.xlsx; NV State Issued Permits Tracker.xlsx; PI EPA Issued Permits Tracker.xlsx; R9 - WTR5 Monthly Permit Status Summary Report.xlsx; Tribal EPA

Issued Permits Tracker.xlsx

Sandra is out of the office this week and asked that I run the monthly reports and distribute them to you.

The monthly reports were scheduled to run automatically this week, but failed due to problems with the Business Intelligence server. These reports were run manually and should be okay since there were few filter prompts.

If you have questions with the reports, please contact Sandra when she returns on Monday June 9th.

Chun Liu U.S. EPA Region 9

Enforcement Division/Information Management Section (ENF-4-1)

75 Hawthorne Street, San Francisco, CA 94105

Phone: (415) 972-3333 Email: <u>liu.chun@epa.gov</u> From: Chew, Sandra

Sent: Monday, May 05, 2014 7:58 AM

To: Smith, DavidW; Bromley, Eugene; Kozelka, Peter; Marincola, JamesPaul; Mues, Pascal;

Sablad, Elizabeth; Sheth, Gary; Stuber, Robyn; Tran, Linh; Whitson, Amelia; Mitschele, Becky;

Greenberg, Ken; Howell, Adam; Karlson, Kristine; Magnan, Eric; PERKINS, SUSANNE;

Polek, Jim; Sakamoto, Glenn; Tinger, John; Ty, Fatima

Cc: Morimoto, Kaoru Subject: May Monthly Report

Attachments: List of Monthly ICIS-NPDES Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 - WTR5

Monthly Permit Status Summary Report.xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued Permits Tracker.xls; PI EPA Issued Permits Tracker.xls;

Tribal EPA Issued Permits Tracker.xls

Attached are the Water Division monthly reports for May. Please contact me if you have any questions.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

From: Roser, Sara

Sent: Wednesday, April 30, 2014 7:54 AM **To:** Ty, Fatima; Sablad, Elizabeth

Subject: FW: FY14 January to March 2014 Program Performance Measures Report to Outcomes to

EPA and attachments

Attachments: #Program Performance A Facilities Inspected (1-1-2014 to 3-31-2014).pdf;

#Program_Performance_NAVs (1-1-2014 to 3-31-2014).pdf; Coordinator's QNCR (1-1-2014 to 3-31-2014).pdf; PRC Performance Measures FY13 Jan to Mar 2014 - Attachment F.docx; Program Performance Measures FY14 January to March 2014-Report to Outcomes.doc; q114

micro chem.xlsx

FYI

From: Wong, Alec Y [mailto:alec.wong@doh.hawaii.gov]

Sent: Tuesday, April 29, 2014 6:01 PM

To: Roser, Sara

Subject: FY14 January to March 2014 Program Performance Measures Report to Outcomes to EPA and attachments

Hi Sara,

Attached are FY14 January to March 2014 Program Performance Measures Report to Outcomes to EPA and attachments. There is no attachment for chemical samples due to backlog of state lab input into the system.

Thanks!

Alec Wong
Clean Water Branch
State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, and dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Pascua, Noralin F noralin.pascua@doh.hawaii.gov

Sent: Monday, April 28, 2014 5:53 PM

To: Sablad, Elizabeth; Cleveland Jaramilla; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: Minor Permit Modification - HI 0020877 - Honouliuli WWTP

Attachments: 20140428.Minor Modification Transmittal - HI 0020877-04049PKP.14.PDF; 20140428.NPDES

Authorization Cover Sheet - Modified Pages - HI 0020877.FNL.14c.PDF

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,

Nora

From: Pascua, Noralin F noralin.pascua@doh.hawaii.gov

Sent: Monday, April 28, 2014 10:24 AM

To: Sablad, Elizabeth; Cleveland Jaramilla; <u>ilum1@honolulu.gov</u>

Cc: Poentis, Kris T

Subject: Minor Permit Modification - Permit No. HI 0020877 - Honouliuli WWTP

Attachments: 20140424.Minor Permit Modification Transmittal - HI 0020877-04046PKP.14.PDF;

20140424.Permit Authorization Cover Sheet and Modified Pages - HI 0020877.FNL.14b.PDF

Good Morning,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

Sent: Tuesday, April 22, 2014 1:55 PM

To: Poentis, Kris T

Subject: RE: Honouliuli Changes

Thanks!! That helps a lot!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, April 22, 2014 1:49 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov Subject: Honouliuli Changes

Hi Elizabeth,

I apologize for not being prepared earlier. The following changes were made to the Honouliuli permit:

Page 4 - Footnote 3 referred to the wrong section. It was previously D.2.h and was changed to D.3 (but it should actually be B.3).

Page 19 – The latitude of station HB7 was corrected.

Page 21 – References to Parts E.4.a and E.4.b were changed to E.3.a and E.3.b.

Page 56 – The map was switched out. The new map does not show the nearshore monitoring stations since the nearshore monitoring requirements were removed from the permit.

I inadvertently did not correct the ammonia nitrogen limitation (wrong units) on page 3 and need to correct page 4 again to change footnote 3.

From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Tuesday, April 22, 2014 1:49 PM

To: Sablad, Elizabeth

Cc: darryl.lum@doh.hawaii.gov

Subject: Honouliuli Changes

Hi Elizabeth,

I apologize for not being prepared earlier. The following changes were made to the Honouliuli permit:

Page 4 - Footnote 3 referred to the wrong section. It was previously D.2.h and was changed to D.3 (but it should actually be B.3).

Page 19 – The latitude of station HB7 was corrected.

Page 21 – References to Parts E.4.a and E.4.b were changed to E.3.a and E.3.b.

Page 56 – The map was switched out. The new map does not show the nearshore monitoring stations since the nearshore monitoring requirements were removed from the permit.

I inadvertently did not correct the ammonia nitrogen limitation (wrong units) on page 3 and need to correct page 4 again to change footnote 3.

From: Pascua, Noralin F noralin.pascua@doh.hawaii.gov

Sent: Tuesday, April 22, 2014 11:15 AM

To: Sablad, Elizabeth; Cleveland Jaramilla; <u>ilum1@honolulu.gov</u>

Cc: Poentis, Kris T

Subject: Minor Permit Modification - Permit No. HI 0020877 - Honouliuli WWTP

Attachments: 20140417.Minor Permit Modification Transmittal - HI 0020877-04042PKP.14.PDF;

20140417. Modified Pages - HI 0020877. PDF

Good Morning,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,

Nora

Sent: Tuesday, April 15, 2014 12:54 PM

To: Kurano, Matthew

Subject: RE: New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars - Honolulu Civil

Beat

I know.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Kurano, Matthew [mailto:matthew.kurano@doh.hawaii.gov]

Sent: Tuesday, April 15, 2014 12:45 PM

To: Sablad, Elizabeth

Subject: FW: New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars - Honolulu Civil Beat

FYI, you're quoted.

Matthew R. Kurano Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify via e-mail immediately and destroy all electronic and paper copies.

From: Miyashiro, Scott S

Sent: Tuesday, April 15, 2014 8:31 AM

To: Kurano, Matthew; Nagaue, Gavin; Tanimoto, Jamie; Weaver, Stefanie; Poentis, Kris T (kris.poentis@doh.hawaii.gov); Lum, Darryl C (darryl.lum@doh.hawaii.gov)

Subject: FW: New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars - Honolulu Civil Beat

From: <u>scott.miyashiro@gmail.com</u> [<u>mailto:no-reply@evernote.com</u>]

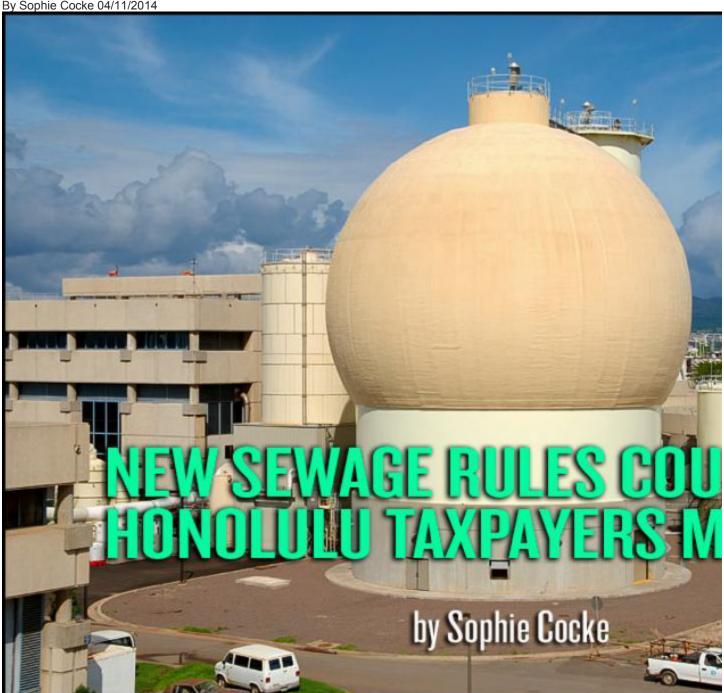
Sent: Tuesday, April 15, 2014 8:31 AM

To: Miyashiro, Scott S

Subject: New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars - Honolulu Civil Beat

New Sewage Rules Could Cost Honolulu **Taxpayers Millions of Dollars**

By Sophie Cocke 04/11/2014



Courtesy Ron Slauson

Synagro's digester at Sand Island turns sewage into fertilizer pellets.

The City of Honolulu is facing tens of thousands of dollars in fines every day it fails to comply with stricter environmental controls at its Kailua Regional Wastewater Treatment Plant.

Every day, up to 15 million gallons of treated sewage and other waste is discharged from the plant into the coastal waters off Kailua and Mokapu Peninsula.

On March 16, the state Department of Health issued a new permit for the facility that puts new restrictions on pollutants including some cancer-causing chemicals that can be released into the ocean.

State officials say the city is risking \$25,000 a day if it doesn't comply with requirements for the Kailua plant, even more when other treatment plants are brought under the new rules.

The permit conditions, which are expected to be applied to the Sand Island and Honouliuli wastewater treatment plants in coming months, have reignited a debate among scientists and engineers as to whether the wastewater discharged off the coast of Oahu is harming coral and fish and even making people sick.

City officials have said it will cost "billions" to comply with the new permit requirements at the three facilities. They say there is little environmental advantage to the changes and have been fighting the new permits.

In March, the city requested a hearing on the Kailua permit, which isn't scheduled to be heard by the state health department until next March. The city's Department of Environmental Services has also said it will challenge the permits in court if it loses its appeal with the state health department. The agency has budgeted \$100,000 for legal expenses for fiscal year 2015.

In the meantime, the state could fine the city up to \$25,000 a day for each permit violation at its Kailua plant, according to DOH spokeswoman Janice Okubo.

The city could also be fined tens of thousands of dollars at its Sand Island and Honouliuli plants if it doesn't comply with new permit regulations expected to be released for those facilities.

Okubo says the state is trying to negotiate an agreement with the city, including any fines, until legal issues are resolved.

Round Two for Oahu's Sewage Debates?

The idea of dumping more than 100 million gallons a day of sewage, agricultural and industrial wastewater off Oahu's coasts where people swim, surf, fish and boat often provokes strong reactions.

But scientists note that the treated wastewater has to go somewhere and Oahu's system has improved substantially since the 1970s when the city was dumping wastewater into streams and nearby coastal waters causing noticeable damage to coral and fish.

Since then, the city has moved the pipes further out to sea and to depths where the wastewater is believed to quickly diffuse and swept out to sea.

Despite major improvements, leaking pipes and sewage discharges prompted environmental groups to sue the city in 2004, a lawsuit later joined by the EPA and state health department. Years of litigation culminated in a 2010 consent decree requiring the city to spend an estimated \$3.5 billion to improve its sewage collection system, as well as upgrade its Sand Island and Honouliuli wastewater treatment plants to "secondary treatment."

The consent decree, which was vigorously opposed by the city, served to stop the battles over Oahu's sewage problems.

But the state health department's new permit requirements is sparking another round of debate, particularly among scientists and engineers who are critical of the estimated \$1.2 billion in upgrades required to convert the Sand Island and Honouliuli wastewater treatment plants to secondary treatment — Honouliuli by 2024 and Sand Island by 2035.

City officials and local scientists say the new permits will require even more advanced treatment.

"This is just irrational," said Hans Krock, a retired University of Hawaii engineer, who worked on the state's water quality standards. "It is unscientific. It is sort of a delusion on the part of the legal people who are trying to impose regulations that they don't understand."

"The science they don't understand," he said. "They don't understand the engineering. If they are successful in imposing this it will result in a huge amount of money and result in no benefit to the environment."

Krock has worked as a consultant for the city's wastewater treatment system, but says he's never accepted any compensation.

"I'm seriously saying this, not because of some prejudice, but because of science," he said.

Krock's sentiments are echoed by other scientists interviewed by Civil Beat as well as in written testimony on the Kailua permit submitted by the state health department's former deputy director of environmental health and two engineers that have worked on the city's wastewater treatment issues.

There was no public testimony supporting the new permit requirements and local environmental groups who were instrumental in forcing the city to fix its aging sewer system, including the Hawaii Sierra Club, said they didn't even know about the new regulations.

Critics of the stricter standards say new requirements limiting dieldrin and chlordane, long banned pesticides, are nearly impossible to reduce at the treatment level. Hawaii's oceans actually need more and not less nutrients because of global warming, they say.

And, they say, there is no evidence that the current wastewater discharges are threatening the environment or human health.

Furthermore, local engineers and scientists say, the state's focus needs to be on controlling stormwater runoff, a much graver threat to the marine ecosystem.

"This is the next, whole generation of pollution control," said Roy Abe, an engineer at Honolulu-based HDR Engineering, a firm managing the city's consent decree. "Water quality professionals feel that we need to spend money where it makes the most sense and it is not in removing nutrients at these treatment plants. It's like throwing money away."

Adhering to Hawaii Water Quality Standards

State health officials declined to comment on the new permits, citing the ongoing contested case.

But documents related to the permit indicate that the city's discharges for the Kailua wastewater plant have exceeded Hawaii's water quality standards for bacteria and nutrients, as well as chlordane and dieldrin.

Elizabeth Sablad, an environmental scientist in the EPA's regional office in San Francisco, which oversees Hawaii, said it isn't clear if these pollutants are causing damage to the environment or humans. But that's what Hawaii's water quality standards are designed to protect against.

Too many nutrients can deplete the ocean's oxygen levels and be toxic to fish and coral, she said. High levels of bacteria can also carry pathogens that make people sick or infect wounds. And the state's dieldrin and chlordane standards "are set to protect against toxicity in aguatic life or human health," said Sablad.

While city official say the new regulations will push them to implement expensive treatment options that go far beyond what's required in the 2010 consent decree, Sablad said that there are a variety of different technologies and treatment options that the city can explore.

She said the EPA does not take into consideration cost when it's reviewing state permit conditions and wasn't in a position to asses the city's claim that it would cost billions to conduct the upgrades.

"We don't take into account the cost because we don't dictate how to comply with the limits," she said.

Currently, the city is seeking to stay the permit conditions until the contested case is resolved, a position that the state attorney general's office has strongly opposed.

"The failure to implement these conditions would mean (the city) could discharge more pollutants into the waters off the Kailua plant throughout the appeal period than should be allowed in the public interest," according to a document signed by David Louie, the state's attorney general, and Edward Bohlen, deputy attorney general and counsel for the state health department.

The attorney general's office also criticizes the city for failing to "present persuasive evidence to DOH in a timely fashion during the permit comment period."

For instance, the city wanted the health department to loosen its bacteria standards, but didn't submit an analysis supporting its position until two days before the comment period ended, and seven months after it received the draft permit, according to documents from the attorney general's office.

DISCUSSION: Do you think Oahu's wastewater needs stricter controls? Are you worried about having to pay for upgrades to the wastewater treatment plants?	e city's
Discussion	

From: Sent: To: Higuchi, Dean

Friday, April 11, 2014 1:10 PM

Albright, David; Anderson, Julie; Appleton, Zac; Ardito, Michael (Separated); Armann, Steve; Barton, Dana; Blumenfeld, Jared; Bose, Laura (Separated); Bromley, Eugene; Calanog, Steve; Caplan, Robert W.; Chow, Eugenia; Demorest, Allen; Drake, Kerry; Eberhardt, Doug; Filart, Cheryl; Fondahl, Lauren; Ford, Roy; Gomes, Janis (Separated); Greenberg, Ken; Grisier, Mary; Guerra, Gary; Gullatt, Kristin; Hanf, Lisa; Hashimoto, Janet; Hiatt, Gerald; Higuchi, Dean; Hood, Timonie; Jones, Joel E.; Kahakui, Kahi; Kemmerer, John; Lawrence, Kathryn; Leon-Guerrero, Ephraim; Li, Corine; Licata, Juanita; Lincoff, Andy; Macler, Bruce; Manzanilla, Enrique; Miller, Amy; Moore, Kathi; Ota, Allan; Polanco, Susan; Pollins, Mark; Pringle, Everett; Priselac, Adrienne; Rao, Kate; Robberson, Bill; Rogow, Michelle; Roser, Sara; Ross, Brian; Schmidt, David; Scott, Jeff; Schultz, Frances; Sheehan, Eileen; Smith, DavidW; Strauss, Alexis; Stuber, Robyn; Ueno, Karen; Vendlinski, Tim; Wiltse, Wendy; Woo, Nancy; Young, Marvin (Separated); Johnson, Kathleen; Maier, Brent; Gentile, Laura; Arcaute, Francisco; PerezSullivan, Margot; Sylls, Gene; Yogi, David; McCarroll, John; Wolfram, Michael; Lee, Michael; Scott, Norwood; Goldstein, Carl; Fernandez, Daniel; Lopez, Mariela; Richman, Lance; Jackson, Julia; VonVacano, Marcela; MURRAY, SHARON; Katzin, Marcy; Mechem, Russell; Mann, Michael; KUO, LYNN; Shaffer, Caleb; Mowrey, Marc; McDaniel, Doug; Vitulano, Karen; Ueno, Karen; Lichens, Christopher; Mues, Pascal; Villanueva, Morena; Byous, Eric; Kermish, Laurie; Magnuson, Janet; Sablad, Elizabeth; Arora, Pankaj; frankrabauliman@deg.gov.mp; reinacamacho@deg.gov.mp; Busterud, Gretchen; Chesnutt, John; Merer, Joe; Mogharabi, Nahal; 'tjonick@sga-inc.net'; Kabei, Arlene (Separated); Tyahla, Stephen; Amato, Paul; Slay, Hudson; LEVIN, NANCY; Glenn, William; Schechter, Debbie (Separated); Moffatt, Brett; Keener, Bill; ZIFF, SARA; Richmond, Dawn; COHEN, Deborra; Zito, Kelly; Jones, Lucrina; Brush, Jason; Cook, Anna-Marie; Konner, Thomas; PERKINS. SUSANNE; Callado, Jinky; Konner, Thomas; PERKINS, SUSANNE; Fleming, Megan; bfpollock@yahoo.com; Rodriguez, Roberto; Barkett, Bonnie; Plenys, Thomas: Kennedy, John (Separated); Henderson, Alita; Pratt, Kristen; Gorini, Kelly; Gambatese, Jason; Karlson, Kristine; Diamond, Jane; Ty, Fatima; Gholson, Greg; Pallarino, Bob; Linder, Steven; Nazmi,

Subject:

: Hawaii News Clips: New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars

New Sewage Rules Could Cost Honolulu Taxpayers Millions of Dollars

Niloufar; Heller, Zoe; Johnson, AudreyL

By Sophie Cocke 04/11/2014 Honolulu Civil Beat

Synagro's digester at Sand Island turns sewage into fertilizer pellets.

The City of Honolulu is facing tens of thousands of dollars in fines every day it fails to comply with stricter environmental controls at its Kailua Regional Wastewater Treatment Plant.

Every day, up to 15 million gallons of treated sewage and other waste is discharged from the plant into the coastal waters off Kailua and Mokapu Peninsula.

On March 16, the state Department of Health issued a new permit for the facility that puts new restrictions on pollutants including some cancer-causing chemicals that can be released into the ocean.

State officials say the city is risking \$25,000 a day if it doesn't comply with requirements for the Kailua plant, even more when other treatment plants are brought under the new rules.

The permit conditions, which are expected to be applied to the Sand Island and Honouliuli wastewater treatment plants in coming months, have reignited a debate among scientists and engineers as to whether the wastewater discharged off the coast of Oahu is harming coral and fish and even making people sick.

City officials <u>have said it will cost "billions" to comply</u> with the new permit requirements at the three facilities. They say there is little environmental advantage to the changes and have been fighting the new permits.

In March, the city requested a hearing on the Kailua permit, which isn't scheduled to be heard by the state health department until next March. The city's Department of Environmental Services has also said it will challenge the permits in court if it loses its appeal with the state health department. The agency has <u>budgeted \$100,000 for legal expenses</u> for fiscal year 2015.

In the meantime, the state could fine the city up to \$25,000 a day for each permit violation at its Kailua plant, according to DOH spokeswoman Janice Okubo.

The city could also be fined tens of thousands of dollars at its Sand Island and Honouliuli plants if it doesn't comply with new permit regulations expected to be released for those facilities.

Okubo says the state is trying to negotiate an agreement with the city, including any fines, until legal issues are resolved.

Round Two for Oahu's Sewage Debates?

The idea of dumping more than 100 million gallons a day of sewage, agricultural and industrial wastewater off Oahu's coasts where people swim, surf, fish and boat often provokes strong reactions.

But scientists note that the treated wastewater has to go somewhere and Oahu's system has improved substantially since the 1970s when the city was dumping wastewater into streams and nearby coastal waters causing noticeable damage to coral and fish.

Since then, the city has moved the pipes further out to sea and to depths where the wastewater is believed to quickly diffuse and swept out to sea.

Despite major improvements, leaking pipes and sewage discharges prompted environmental groups to sue the city in 2004, a lawsuit later joined by the EPA and state health department. Years of litigation culminated in a 2010 consent decree requiring the city to spend an estimated \$3.5 billion to improve its sewage collection system, as well as upgrade its Sand Island and Honouliuli wastewater treatment plants to "secondary treatment."

The consent decree, which was vigorously opposed by the city, served to stop the battles over Oahu's sewage problems.

But the state health department's new permit requirements is sparking another round of debate, particularly among scientists and engineers who are critical of the estimated \$1.2 billion in upgrades required to convert the Sand Island and Honouliuli wastewater treatment plants to secondary treatment — Honouliuli by 2024 and Sand Island by 2035.

City officials and local scientists say the new permits will require even more advanced treatment.

"This is just irrational," said Hans Krock, a retired University of Hawaii engineer, who worked on the state's water quality standards. "It is unscientific. It is sort of a delusion on the part of the legal people who are trying to impose regulations that they don't understand."

"The science they don't understand," he said. "They don't understand the engineering. If they are successful in imposing this it will result in a huge amount of money and result in no benefit to the environment."

Krock has worked as a consultant for the city's wastewater treatment system, but says he's never accepted any compensation.

"I'm seriously saying this, not because of some prejudice, but because of science," he said.

Krock's sentiments are echoed by other scientists interviewed by Civil Beat as well as in written testimony on the Kailua permit submitted by the state health department's former deputy director of environmental health and two engineers that have worked on the city's wastewater treatment issues.

There was no public testimony supporting the new permit requirements and local environmental groups who were instrumental in forcing the city to fix its aging sewer system, including the Hawaii Sierra Club, said they didn't even know about the new regulations.

Critics of the stricter standards say new requirements limiting dieldrin and chlordane, long banned pesticides, are nearly impossible to reduce at the treatment level. Hawaii's oceans actually need more and not less nutrients because of global warming, they say.

And, they say, there is no evidence that the current wastewater discharges are threatening the environment or human health.

Furthermore, local engineers and scientists say, the state's focus needs to be on controlling stormwater runoff, a much graver threat to the marine ecosystem.

"This is the next, whole generation of pollution control," said Roy Abe, an engineer at Honolulu-based HDR Engineering, a firm managing the city's consent decree. "Water quality professionals feel that we need to spend money where it makes the most sense and it is not in removing nutrients at these treatment plants. It's like throwing money away."

Adhering to Hawaii Water Quality Standards

State health officials declined to comment on the new permits, citing the ongoing contested case.

But documents related to the permit indicate that the city's discharges for the Kailua wastewater plant have exceeded Hawaii's water quality standards for bacteria and nutrients, as well as chlordane and dieldrin.

Elizabeth Sablad, an environmental scientist in the EPA's regional office in San Francisco, which oversees Hawaii, said it isn't clear if these pollutants are causing damage to the environment or humans. But that's what Hawaii's water quality standards are designed to protect against.

Too many nutrients can deplete the ocean's oxygen levels and be toxic to fish and coral, she said. High levels of bacteria can also carry pathogens that make people sick or infect wounds. And the state's dieldrin and chlordane standards "are set to protect against toxicity in aquatic life or human health," said Sablad.

While city official say the new regulations will push them to implement expensive treatment options that go far beyond what's required in the 2010 consent decree, Sablad said that there are a variety of different technologies and treatment options that the city can explore.

She said the EPA does not take into consideration cost when it's reviewing state permit conditions and wasn't in a position to asses the city's claim that it would cost billions to conduct the upgrades.

"We don't take into account the cost because we don't dictate how to comply with the limits," she said.

Currently, the city is seeking to stay the permit conditions until the contested case is resolved, a position that the state attorney general's office has strongly opposed.

"The failure to implement these conditions would mean (the city) could discharge more pollutants into the waters off the Kailua plant throughout the appeal period than should be allowed in the public interest," according to a document signed by David Louie, the state's attorney general, and Edward Bohlen, deputy attorney general and counsel for the state health department.

The attorney general's office also criticizes the city for failing to "present persuasive evidence to DOH in a timely fashion during the permit comment period."

For instance, the city wanted the health department to loosen its bacteria standards, but didn't submit an analysis supporting its position until two days before the comment period ended, and seven months after it received the draft permit, according to documents from the attorney general's office.

Thanks!

Dean Higuchi
Press Officer/Congressional Liaison/Public Affairs
US EPA, Region 9, Hawaii Office
higuchi.dean@epa.gov
808-541-2711

From: Higuchi, Dean

Sent: Wednesday, March 12, 2014 4:12 PM
To: Albright, David; Anderson, Julie; Apple

Albright, David; Anderson, Julie; Appleton, Zac; Ardito, Michael (Separated); Armann, Steve; Barton, Dana; Blumenfeld, Jared; Bose, Laura (Separated); Bromley, Eugene; Calanog, Steve; Caplan, Robert W.; Chow, Eugenia; Demorest, Allen; Drake, Kerry; Eberhardt, Doug; Filart, Cheryl; Fondahl, Lauren; Ford, Roy; Gomes, Janis (Separated); Greenberg, Ken; Grisier, Mary; Guerra, Gary; Gullatt, Kristin; Hanf, Lisa; Hashimoto, Janet; Hiatt, Gerald; Higuchi, Dean; Hood, Timonie; Jones, Joel E.; Kahakui, Kahi; Kemmerer, John; Lawrence, Kathryn; Leon-Guerrero, Ephraim; Li, Corine; Licata, Juanita; Lincoff, Andy; Macler, Bruce; Manzanilla, Enrique; Miller, Amy; Moore, Kathi; Ota, Allan; Polanco, Susan; Pollins, Mark; Pringle, Everett; Priselac, Adrienne; Rao, Kate; Robberson, Bill; Rogow, Michelle; Roser, Sara; Ross, Brian; Schmidt, David; Scott, Jeff; Schultz, Frances; Sheehan, Eileen; Smith, DavidW; Strauss, Alexis; Stuber, Robyn; Ueno, Karen; Vendlinski, Tim; Wiltse, Wendy; Woo, Nancy; Young, Marvin (Separated); Johnson, Kathleen; Maier, Brent; Gentile, Laura; Arcaute, Francisco; PerezSullivan, Margot; Sylls, Gene; Yoqi, David; McCarroll, John; Wolfram, Michael; Lee, Michael; Scott, Norwood; Goldstein, Carl; Fernandez, Daniel; Lopez, Mariela; Richman, Lance; Jackson, Julia; VonVacano, Marcela; MURRAY, SHARON; Katzin, Marcy; Mechem, Russell; Mann, Michael; KUO, LYNN; Shaffer, Caleb; Mowrey, Marc; McDaniel, Doug; Vitulano, Karen; Ueno, Karen; Lichens, Christopher; Mues, Pascal; Villanueva, Morena; Byous, Eric; Kermish, Laurie; Magnuson, Janet; Sablad, Elizabeth; Arora, Pankaj; frankrabauliman@deg.gov.mp; reinacamacho@deg.gov.mp; Busterud, Gretchen; Chesnutt, John; Merer, Joe; Mogharabi, Nahal; 'tjonick@sga-inc.net'; Kabei, Arlene (Separated); Tyahla, Stephen; Amato, Paul; Slay, Hudson; LEVIN, NANCY; Glenn, William; Schechter, Debbie (Separated); Moffatt, Brett; Keener, Bill; ZIFF, SARA; Richmond, Dawn; COHEN, Deborra; Zito, Kelly; Jones, Lucrina; Brush, Jason; Cook, Anna-Marie; Konner, Thomas; PERKINS, SUSANNE; Callado, Jinky; Konner, Thomas; PERKINS, SUSANNE; Fleming, Megan; bfpollock@vahoo.com: Rodriguez, Roberto: Barkett, Bonnie: Plenvs, Thomas: Kennedy, John (Separated); Henderson, Alita; Pratt, Kristen; Gorini, Kelly; Gambatese, Jason; Karlson, Kristine; Diamond, Jane; Ty, Fatima; Gholson, Greg; Pallarino, Bob; Linder, Steven; Nazmi,

Niloufar

Subject: Hawaii News Clips: Honolulu Says It Will Fight New Rules For Sewage Treatment (HDOH

water quality standards requirements)

Honolulu Says It Will Fight New Rules For Sewage Treatment

By Sophie Cocke 03/12/2014 Civil Beat

Honolulu's Department of Environmental Services says that it's facing billions of dollars in improvements to three sewage treatment plants if new environmental requirements mandated by the state Department of Health are allowed to go into effect — and it's planning to fight them.

Some of the requirements are "ridiculous," Lori Kahikina, director of the city's environmental services department told members of the City Council's Budget Committee during a Tuesday hearing to review the department's proposed fiscal year 2015 budget. "So we are working with the corporation counsel and corporation counsel will hire a private attorney to fight this."

The department has set aside \$100,000 for potential legal costs for the upcoming fiscal year.

The costs for sewage improvements would likely be passed on to Oahu ratepayers, city officials said.

Gary Gill, deputy director of environmental health for the state health department, said in an email that the department "looks forward to working with the City & County as they exercise their right under the law to contest the permits."

Kahikina said that the permits for the city's Sand Island, Kailua and Honouliuli sewage treatment plants are up for renewal and the state health department is imposing stricter water quality standards that regulate effluent levels. The city would have to put in place new equipment and technology in order to comply.

New permit conditions for the Kailua plant were supposed to go into effect last month, she told Civil Beat, but state health officials agreed to extend the deadline to later this month.

Similar permit conditions are expected to be required for the Sand Island and Honouliuli sewage plants in coming months.

Kahikina said that the stricter sewage rules are better suited for mainland states.

"We are different from the mainland," she said. "So we are a huge ocean, so it gets diluted and nobody swims at 200 feet, two miles out."

The stricter state requirements would be in addition to a <u>massive 2010 settlement</u> with the U.S. Environmental Protection Agency that requires the city to upgrade its aging sewer lines and install secondary treatment facilities at Sand Island and Honouliuli. The federal requirements are expected to cost the city more than a billion dollars through 2035.

Mayor Kirk Caldwell has budgeted \$270 million next fiscal year to cover the sewage costs.

From: Polek, Jim

Sent: Wednesday, March 05, 2014 7:51 AM

To: Sablad, Elizabeth

Subject: RE: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Thanks for keeping me in the loop Elizabeth.

From: Sablad, Elizabeth

Sent: Monday, March 03, 2014 4:20 PM

To: Smith, DavidW; Polek, Jim; Woo, Nancy; Roser, Sara

Subject: FW: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Thought you all might like to know the permit for Honouliuli WWTP has been issued!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Pascua, Noralin F [mailto:noralin.pascua@doh.hawaii.gov]

Sent: Monday, March 03, 2014 4:12 PM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

From: Smith, DavidW

Sent: Monday, March 03, 2014 4:34 PM

To: Sablad, Elizabeth

Subject: RE: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Great news!

David Smith
Manager
NPDES Permits Office (WTR-5)
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94602
(415) 972-3464 (office)
(415) 972-947-3545 (fax)

From: Sablad, Elizabeth

Sent: Monday, March 03, 2014 4:20 PM

To: Smith, DavidW; Polek, Jim; Woo, Nancy; Roser, Sara

Subject: FW: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Thought you all might like to know the permit for Honouliuli WWTP has been issued!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Pascua, Noralin F [mailto:noralin.pascua@doh.hawaii.gov]

Sent: Monday, March 03, 2014 4:12 PM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

Sent: Monday, March 03, 2014 4:20 PM

To: Smith, DavidW; Polek, Jim; Woo, Nancy; Roser, Sara

Subject: FW: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP 20140228.Final Permit Transmittal - HI 0020877-02069PKP.14.PDF; 20140228.0020877.FNL.14.pdf; 20140228.Final Fact Sheet - HI 0020877 -

02069PKP.14a.pdf; 20140228.Response to Comments on Public Notice NPDES Permit and

Final Determinations - HI 0020877 - 02069PKP.14b.pdf

Thought you all might like to know the permit for Honouliuli WWTP has been issued!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Pascua, Noralin F [mailto:noralin.pascua@doh.hawaii.gov]

Sent: Monday, March 03, 2014 4:12 PM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

Sent: Monday, March 03, 2014 4:20 PM

To: Poentis, Kris T

Subject: RE: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Yay!

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Pascua, Noralin F [mailto:noralin.pascua@doh.hawaii.gov]

Sent: Monday, March 03, 2014 4:12 PM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

From: Pascua, Noralin F noralin.pascua@doh.hawaii.gov

Sent: Monday, March 03, 2014 4:12 PM

To: Sablad, Elizabeth; cjaramilla@honolulu.gov; jlum1@honolulu.gov

Cc: Poentis, Kris T

 Subject:
 NPDES Permit Issuance - Permit No. HI 0020877 - Honouliuli WWTP

 Attachments:
 20140228.Final Permit Transmittal - HI 0020877-02069PKP.14.PDF;

 20140228.0020877.FNL.14.pdf; 20140228.Final Fact Sheet - HI 0020877

02069PKP.14a.pdf; 20140228.Response to Comments on Public Notice NPDES Permit and

Final Determinations - HI 0020877 - 02069PKP.14b.pdf

Good Afternoon,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks, Nora

From: Poentis, Kris T <u><kris.poentis@doh.hawaii.gov></u>
Sent: Wednesday, February 26, 2014 12:36 PM

To: Sablad, Elizabeth
Cc: Lum, Darryl C

Subject: RE: Honouliuli WWTP

Thanks Elizabeth! I looked that up too. I think just the sludge report deadline is a set federal requirement. Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, February 26, 2014 10:30 AM

To: Poentis, Kris T

Subject: RE: Honouliuli WWTP

Hi Kris,

I just found out any date is okay, as long as it is annual. In that case, the permit and fact sheet are okay with me!

Thanks! Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, February 26, 2014 10:42 AM

To: Sablad, Elizabeth **Subject:** Honouliuli WWTP

Hi Elizabeth,

Please take a look at the final permit, fact sheet and response to comments for Honouliuli WWTP. We will issue the final approval upon your concurrence. Thanks!

From: Poentis, Kris T kris.poentis@doh.hawaii.gov>
Sent: Wednesday, February 26, 2014 12:36 PM

To: Sablad, Elizabeth
Cc: Lum, Darryl C

Subject: RE: Honouliuli WWTP

Thanks Elizabeth! I looked that up too. I think just the sludge report deadline is a set federal requirement. Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, February 26, 2014 10:30 AM

To: Poentis, Kris T

Subject: RE: Honouliuli WWTP

Hi Kris,

I just found out any date is okay, as long as it is annual. In that case, the permit and fact sheet are okay with me!

Thanks! Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, February 26, 2014 10:42 AM

To: Sablad, Elizabeth **Subject:** Honouliuli WWTP

Hi Elizabeth,

Please take a look at the final permit, fact sheet and response to comments for Honouliuli WWTP. We will issue the final approval upon your concurrence. Thanks!

Sent: Wednesday, February 26, 2014 12:30 PM

To: Poentis, Kris T

Subject: RE: Honouliuli WWTP

Hi Kris,

I just found out any date is okay, as long as it is annual. In that case, the permit and fact sheet are okay with me!

Thanks! Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, February 26, 2014 10:42 AM

To: Sablad, Elizabeth **Subject:** Honouliuli WWTP

Hi Elizabeth,

Please take a look at the final permit, fact sheet and response to comments for Honouliuli WWTP. We will issue the final approval upon your concurrence. Thanks!

Sent: Wednesday, February 26, 2014 12:24 PM

To: Poentis, Kris T

Subject: RE: Honouliuli WWTP

Hi Kris,

I have one concern, which is the pretreatment annual report submittal date. I'm not sure if that date is negotiable. I am looking into it and will get back to you as soon as I can.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, February 26, 2014 10:42 AM

To: Sablad, Elizabeth **Subject:** Honouliuli WWTP

Hi Elizabeth,

Please take a look at the final permit, fact sheet and response to comments for Honouliuli WWTP. We will issue the final approval upon your concurrence. Thanks!

Poentis, Kris T kris.poentis@doh.hawaii.gov Wednesday, February 26, 2014 10:42 AM From: Sent:

To: Sablad, Elizabeth Honouliuli WWTP Subject:

final permit - Honouliuli WWTP.doc; final fact sheet - Honouliuli WWTP.doc; Response to Comment for Honouliuli Public Notice Permit.docx Attachments:

Hi Elizabeth,

Please take a look at the final permit, fact sheet and response to comments for Honouliuli WWTP. We will issue the final approval upon your concurrence. Thanks! Kris

From: Lum, Darryl C <a href="m

Sent: Friday, January 17, 2014 10:16 AM

To: Rossio, Marianne Fuji; Sumida, Shane S; kris.poentis@doh.hawaii.gov

Cc: Sablad, Elizabeth; <u>Dan.Connally@pgenv.com</u>

Subject: FW: Questions about permits/audits

Hi All,

Please change your language to 1.b below and keep the west coast methods citation.

Thanks, Darryl

From: Wagner, Amy [mailto:Wagner.Amy@epa.gov]

Sent: Friday, January 17, 2014 7:19 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; Kurano, Matthew

Subject: RE: Questions about permits/audits

Hi Elizabeth,

I definitely think that they should use version 1.b. along with the West coast methods citation for QC. It will be interesting to see whether the labs are using the old or new method.

Amy

Amy Wagner
Marine Biologist
USEPA Region 9 Laboratory
1337 S. 46th St., Bldg. 201
Richmond, CA 94804
W (510) 412-2329
F (510) 412-2302

wagner.amy@epa.gov

http://www.epa.gov/region09/lab/

From: Sablad, Elizabeth

Sent: Friday, January 17, 2014 7:53 AM

To: Wagner, Amy

Cc: Lum, Darryl C; Kurano, Matthew

Subject: FW: Questions about permits/audits

Hi Amy,

Do you have any concern with the more recent language being used in Hawaii permits (see Darryl's note below)? It looks like we might want to cite your version in 1.b. along with the West Coast methods cite they currently include.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Thursday, January 16, 2014 4:20 PM

To: Sablad, Elizabeth

Subject: FW: Questions about permits/audits

Hi Elizabeth,

We have the following language in Honouliuli WWTP, Kailua WWTP, and MCBH WWTP:

The Permittee shall conduct chronic toxicity testing on *T. gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA from a method developed by George Morrison, EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI) (EPA/600/R-12/022) and follow Quality Assurance procedures as described in the test methods manual Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms (EPA/600/R-95/136, 1995).

This looks like another hybrid. Should we just use 1.b below word for word?

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, January 16, 2014 9:53 AM

To: Wagner, Amy; Kurano, Matthew

Cc: Lum, Darryl C

Subject: RE: Questions about permits/audits

I'll let Matt chime in on questions 2 and 3, but on question 1, I believe we have fixed the reference for the method in newer permits. I do want to flag this for **Darryl**, though, so he can check the latest permit template. We should ensure the latest method is cited.

-Elizabeth

Elizabeth Sablad

NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Wagner, Amy

Sent: Thursday, January 16, 2014 11:39 AM **To:** Sablad, Elizabeth; Kurano, Matthew **Subject:** Questions about permits/audits

Hi Elizabeth & Matt,

Thanks for requesting DOH permit writers to email me the Hawaiian Electric and Navy permits so quickly. A couple of observations & questions on the objectives of my lab evaluations:

1) The *Tripneustes* citation in most of the new Hawaiian Electric permits (0000604, 1120801, 0000027,0000019) and Navy permit HI1120801) is incorrect. It appears to be a combination of the 1998 draft method and the 2012 peer-reviewed method as follows:

The Permittee shall conduct chronic toxicity testing on *Tripneustes gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method 3/16/98 (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA, Diane Nacci, EPA, Office of Research and Development, National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI [EPA/600/R-12/022])

This is a hybrid between:

- a) Trypneustes gratilla, Hawaiian sea urchin, using Hawaiian Collector Urchin, Trypneustes gratilla (hawa'e) Fertilization Test Method (3/16/98) Adapted by Amy Wagner, U. S. EPA Region IX Laboratory, Richmond, CA from a method developed by George Morrison, U. S. EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI and
- b) Tropical Collector Urchin, *Tripneustes gratilla*, Fertilization Test Method. April, 2012. Amy Wagner, U.S. EPA, Region 9 Laboratory, Richmond, CA and Diane Nacci, U.S. EPA, Office of Research and Development National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI (EPA/600/R-12/022).

I'm wondering if the labs are actually following the previous draft method (1998) or the peer-reviewed method (2012). If there is a re-opener, that is a pretty important method citation to correct. The biggest difference is that the old methods required a 2500:1 sperm:egg ratio, and the new method requires sperm trials with a S:E ratio based on the trail.

- 2) Since the Navy's permits are a mixture of method a) and b), have they been required (or requested themselves) to use the newer peer-reviewed method for all permits? The newer permits using method (b) are so recent that it will be difficult for me to see QC trends. So I guess my question is do you want me to evaluate how they running the current (2012) method by watching them conduct the tests real-time and look at historical data to evaluate quality control?
- 3) Are you only interested in me evaluating the labs' capabilities to conduct *T. gratilla* tests? I noticed that Navy has a permit that is using the chronic marine methods. I'm assuming they are using a mainland lab to conduct

their tests and I won't be evaluating those methods. I can also look at the Navy's *Ceriodaphnia dubia* data and lab techniques for permit 0110086 if you would like.

Thanks,
Amy

Amy Wagner
Marine Biologist
USEPA Region 9 Laboratory
1337 S. 46th St., Bldg. 201
Richmond, CA 94804
W (510) 412-2329
F (510) 412-2302
wagner.amy@epa.gov
http://www.epa.gov/region09/lab/

From: Wagner, Amy

Friday, January 17, 2014 9:19 AM Sent:

Sablad, Elizabeth To:

Lum, Darryl C; Kurano, Matthew Cc: RE: Questions about permits/audits Subject:

Hi Elizabeth,

I definitely think that they should use version 1.b. along with the West coast methods citation for QC. It will be interesting to see whether the labs are using the old or new method.

Amy

Amy Wagner Marine Biologist **USEPA Region 9 Laboratory** 1337 S. 46th St., Bldg. 201 Richmond, CA 94804 W (510) 412-2329 F (510) 412-2302 wagner.amy@epa.gov

http://www.epa.gov/region09/lab/

From: Sablad, Elizabeth

Sent: Friday, January 17, 2014 7:53 AM

To: Wagner, Amy

Cc: Lum, Darryl C; Kurano, Matthew

Subject: FW: Questions about permits/audits

Hi Amy,

Do you have any concern with the more recent language being used in Hawaii permits (see Darryl's note below)? It looks like we might want to cite your version in 1.b. along with the West Coast methods cite they currently include.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Thursday, January 16, 2014 4:20 PM

To: Sablad, Elizabeth

Subject: FW: Questions about permits/audits

Hi Elizabeth,

We have the following language in Honouliuli WWTP, Kailua WWTP, and MCBH WWTP:

The Permittee shall conduct chronic toxicity testing on *T. gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA from a method developed by George Morrison, EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI) (EPA/600/R-12/022) and follow Quality Assurance procedures as described in the test methods manual Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms (EPA/600/R-95/136, 1995).

This looks like another hybrid. Should we just use 1.b below word for word?

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, January 16, 2014 9:53 AM **To:** Wagner, Amy; Kurano, Matthew

Cc: Lum, Darryl C

Subject: RE: Questions about permits/audits

I'll let Matt chime in on questions 2 and 3, but on question 1, I believe we have fixed the reference for the method in newer permits. I do want to flag this for **Darryl**, though, so he can check the latest permit template. We should ensure the latest method is cited.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Wagner, Amy

Sent: Thursday, January 16, 2014 11:39 AM **To:** Sablad, Elizabeth; Kurano, Matthew **Subject:** Questions about permits/audits

Hi Elizabeth & Matt,

Thanks for requesting DOH permit writers to email me the Hawaiian Electric and Navy permits so quickly. A couple of observations & questions on the objectives of my lab evaluations:

1) The *Tripneustes* citation in most of the new Hawaiian Electric permits (0000604, 1120801, 0000027,0000019) and Navy permit HI1120801) is incorrect. It appears to be a combination of the 1998 draft method and the 2012 peer-reviewed method as follows:

The Permittee shall conduct chronic toxicity testing on *Tripneustes gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method 3/16/98 (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA, Diane Nacci, EPA, Office of Research and Development, National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI [EPA/600/R-12/022])

This is a hybrid between:

- a) Trypneustes gratilla, Hawaiian sea urchin, using Hawaiian Collector Urchin, Trypneustes gratilla (hawa'e) Fertilization Test Method (3/16/98) Adapted by Amy Wagner, U. S. EPA Region IX Laboratory, Richmond, CA from a method developed by George Morrison, U. S. EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI and
- b) Tropical Collector Urchin, *Tripneustes gratilla*, Fertilization Test Method. April, 2012. Amy Wagner, U.S. EPA, Region 9 Laboratory, Richmond, CA and Diane Nacci, U.S. EPA, Office of Research and Development National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI (EPA/600/R-12/022).

I'm wondering if the labs are actually following the previous draft method (1998) or the peer-reviewed method (2012). If there is a re-opener, that is a pretty important method citation to correct. The biggest difference is that the old methods required a 2500:1 sperm:egg ratio, and the new method requires sperm trials with a S:E ratio based on the trail.

- 2) Since the Navy's permits are a mixture of method a) and b), have they been required (or requested themselves) to use the newer peer-reviewed method for all permits? The newer permits using method (b) are so recent that it will be difficult for me to see QC trends. So I guess my question is do you want me to evaluate how they running the current (2012) method by watching them conduct the tests real-time and look at historical data to evaluate quality control?
- 3) Are you only interested in me evaluating the labs' capabilities to conduct *T. gratilla* tests? I noticed that Navy has a permit that is using the chronic marine methods. I'm assuming they are using a mainland lab to conduct their tests and I won't be evaluating those methods. I can also look at the Navy's *Ceriodaphnia dubia* data and lab techniques for permit 0110086 if you would like.

Thanks,	
Amy	

Amy Wagner
Marine Biologist
USEPA Region 9 Laboratory
1337 S. 46th St., Bldg. 201
Richmond, CA 94804
W (510) 412-2329
F (510) 412-2302
wagner.amy@epa.gov

http://www.epa.gov/region09/lab/	

Sent: Friday, January 17, 2014 8:28 AM

To: Lum, Darryl C Cc: Smith, DavidW

Subject: Agreements/follow-up actions and Intake Credits

Hi Darryl,

At first glance, these timeframes look doable. I did receive the consistency documents from Marianne. Thanks!

For intake credits, the CFR cite is 40 CFR 122.45(g), which applies to TBELs, although California adopted similar requirements in section 1.4.4 of their **Policy for Implementation of Toxics Standards for Inland Surface Waters** for WQBELs:

http://www.swrcb.ca.gov/water issues/programs/state implementation policy/docs/final.pdf

As far as example permits with intake credits, I'll need some time to look into that.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Thursday, January 16, 2014 2:07 PM

To: Sablad, Elizabeth

Subject: RE: Agreements/follow-up actions for your review

Hi Elizabeth,

Everything looks good. I asked Marianne to email you our consistency document.

We did forget to bring up the limit set issue. Due to restrictions in our database, the CWB Engineers will be inputting the limit sets into our database, which will flow to ICIS. Due to this additional work and the learning curve, ICIS may not be updated as quickly as before.

Please see below in **green** for draft timeframes. I made this up. Glenn and I are meeting with Myron next week Tuesday to go over the draft revisions to our WQS. After that we'll need to run the draft by Alec, Watson, and Ted. I think if we could get the intake credit examples soon that would be helpful. Also, our priority is the standard water quality assessment methodology.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, January 15, 2014 8:44 AM

To: Lum, Darryl C

Subject: Agreements/follow-up actions for your review

Hi Darryl,

Can you review these and let me know if I mischaracterized anything? We should also think about timeframes for holding these sessions. Any thoughts would be appreciated! Thanks!!

-Elizabeth

Key agreements:

- a. DOH will reissue FY13 and earlier carryover major permits (Honouliuli, Sand Island, Kailua, Chevron, MCB Kaneohe Bay, and Hilo) no later than September 30, 2014.
- b. DOH will review contract schedule and adhere more closely to agreed-upon turn-around times for permit deliverables.
- c. DOH will issue permits included in the FY14 Permit Issuance Schedule.

Follow-up meetings/actions:

- a. Potential Maui MS4 designation scope and process: DOH/EPA will hold follow-up discussion. April 2014
- b. Navy petition on WQS: DOH/EPA will hold follow-up discussion, including WQS staff. April 2014
- c. Permit Writer's Training: EPA will determine process/logistics of hosting a training and provide to DOH. February 2014
- d. Fact Sheet Development Review and Q &A: March 2014
 - 1. DOH will provide draft consistency document to EPA for review.
 - 2. DOH/EPA will hold follow-up discussion.
- e. Guidance on reviewing ZOM/dilution studies April 2014
 - 1. EPA will send DOH guidance document.
 - 2. DOH/EPA will hold follow-up discussion.
- f. Intake credit policy and implementation examples January or early February 2014
 - 1. EPA will provide DOH examples.
 - 2. DOH/EPA will hold follow-up discussion, including WQS staff.
- g. Permit as a shield: DOH/EPA will hold follow-up discussion, including enforcement staff. March 2014

Spring Working Meetings/Workshops: Begin discussion ending of January or early February 2014

- a. Standard water quality assessment methodology and how consistent sampling/monitoring frequencies should be set to demonstrate compliance with all components of WQS.
- b. System to enforce HAR 11-54 and 11-55 requirements, including "unpermitted discharges": including WQS, Enforcement, and ORC staff.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 <u>sablad.elizabeth@epa.gov</u>

Sent: Friday, January 17, 2014 7:53 AM

To: Wagner, Amy

Cc: Lum, Darryl C; Kurano, Matthew FW: Questions about permits/audits

Hi Amy,

Do you have any concern with the more recent language being used in Hawaii permits (see Darryl's note below)? It looks like we might want to cite your version in 1.b. along with the West Coast methods cite they currently include.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Lum, Darryl C [mailto:darryl.lum@doh.hawaii.gov]

Sent: Thursday, January 16, 2014 4:20 PM

To: Sablad, Elizabeth

Subject: FW: Questions about permits/audits

Hi Elizabeth,

We have the following language in Honouliuli WWTP, Kailua WWTP, and MCBH WWTP:

The Permittee shall conduct chronic toxicity testing on *T. gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA from a method developed by George Morrison, EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI) (EPA/600/R-12/022) and follow Quality Assurance procedures as described in the test methods manual Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms (EPA/600/R-95/136, 1995).

This looks like another hybrid. Should we just use 1.b below word for word?

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, January 16, 2014 9:53 AM **To:** Wagner, Amy; Kurano, Matthew

Cc: Lum, Darryl C

Subject: RE: Questions about permits/audits

I'll let Matt chime in on questions 2 and 3, but on question 1, I believe we have fixed the reference for the method in newer permits. I do want to flag this for **Darryl**, though, so he can check the latest permit template. We should ensure the latest method is cited.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Wagner, Amy

Sent: Thursday, January 16, 2014 11:39 AM **To:** Sablad, Elizabeth; Kurano, Matthew **Subject:** Questions about permits/audits

Hi Elizabeth & Matt,

Thanks for requesting DOH permit writers to email me the Hawaiian Electric and Navy permits so quickly. A couple of observations & questions on the objectives of my lab evaluations:

1) The *Tripneustes* citation in most of the new Hawaiian Electric permits (0000604, 1120801, 0000027,0000019) and Navy permit HI1120801) is incorrect. It appears to be a combination of the 1998 draft method and the 2012 peer-reviewed method as follows:

The Permittee shall conduct chronic toxicity testing on *Tripneustes gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method 3/16/98 (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA, Diane Nacci, EPA, Office of Research and Development, National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI [EPA/600/R-12/022])

This is a hybrid between:

- a) Trypneustes gratilla, Hawaiian sea urchin, using Hawaiian Collector Urchin, Trypneustes gratilla (hawa'e) Fertilization Test Method (3/16/98) Adapted by Amy Wagner, U. S. EPA Region IX Laboratory, Richmond, CA from a method developed by George Morrison, U. S. EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI and
- b) Tropical Collector Urchin, *Tripneustes gratilla*, Fertilization Test Method. April, 2012. Amy Wagner, U.S. EPA, Region 9 Laboratory, Richmond, CA and Diane Nacci, U.S. EPA, Office of Research and Development National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI (EPA/600/R-12/022).

I'm wondering if the labs are actually following the previous draft method (1998) or the peer-reviewed method (2012). If there is a re-opener, that is a pretty important method citation to correct. The biggest difference is that the old methods required a 2500:1 sperm:egg ratio, and the new method requires sperm trials with a S:E ratio based on the trail.

- 2) Since the Navy's permits are a mixture of method a) and b), have they been required (or requested themselves) to use the newer peer-reviewed method for all permits? The newer permits using method (b) are so recent that it will be difficult for me to see QC trends. So I guess my question is do you want me to evaluate how they running the current (2012) method by watching them conduct the tests real-time and look at historical data to evaluate quality control?
- 3) Are you only interested in me evaluating the labs' capabilities to conduct *T. gratilla* tests? I noticed that Navy has a permit that is using the chronic marine methods. I'm assuming they are using a mainland lab to conduct their tests and I won't be evaluating those methods. I can also look at the Navy's *Ceriodaphnia dubia* data and lab techniques for permit 0110086 if you would like.

T	ľ	16	ar	1	k	S	,
Δ	۱	n	y	,			

Amy Wagner
Marine Biologist
USEPA Region 9 Laboratory
1337 S. 46th St., Bldg. 201
Richmond, CA 94804
W (510) 412-2329
F (510) 412-2302
wagner.amy@epa.gov

http://www.epa.gov/region09/lab/

From: Lum, Darryl C <a href="m

Sent: Thursday, January 16, 2014 4:20 PM

To: Sablad, Elizabeth

Subject: FW: Questions about permits/audits

Hi Elizabeth,

We have the following language in Honouliuli WWTP, Kailua WWTP, and MCBH WWTP:

The Permittee shall conduct chronic toxicity testing on *T. gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA from a method developed by George Morrison, EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI) (EPA/600/R-12/022) and follow Quality Assurance procedures as described in the test methods manual Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to West Coast Marine and Estuarine Organisms (EPA/600/R-95/136, 1995).

This looks like another hybrid. Should we just use 1.b below word for word?

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, January 16, 2014 9:53 AM **To:** Wagner, Amy; Kurano, Matthew

Cc: Lum, Darryl C

Subject: RE: Questions about permits/audits

I'll let Matt chime in on questions 2 and 3, but on question 1, I believe we have fixed the reference for the method in newer permits. I do want to flag this for **Darryl**, though, so he can check the latest permit template. We should ensure the latest method is cited.

-Elizabeth

From: Wagner, Amy

Sent: Thursday, January 16, 2014 11:39 AM **To:** Sablad, Elizabeth; Kurano, Matthew **Subject:** Questions about permits/audits

Hi Elizabeth & Matt,

Thanks for requesting DOH permit writers to email me the Hawaiian Electric and Navy permits so quickly. A couple of observations & questions on the objectives of my lab evaluations:

1) The *Tripneustes* citation in most of the new Hawaiian Electric permits (0000604, 1120801, 0000027,0000019) and Navy permit HI1120801) is incorrect. It appears to be a combination of the 1998 draft method and the 2012 peer-reviewed method as follows:

The Permittee shall conduct chronic toxicity testing on *Tripneustes gratilla* using Hawaiian Collector Urchin, *Tripneustes gratilla* (Hawa'e) Fertilization Test Method 3/16/98 (Adapted by Amy Wagner, EPA Region 9 Laboratory, Richmond, CA, Diane Nacci, EPA, Office of Research and Development, National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI [EPA/600/R-12/022])

This is a hybrid between:

- a) Trypneustes gratilla, Hawaiian sea urchin, using Hawaiian Collector Urchin, Trypneustes gratilla (hawa'e) Fertilization Test Method (3/16/98) Adapted by Amy Wagner, U. S. EPA Region IX Laboratory, Richmond, CA from a method developed by George Morrison, U. S. EPA, ORD Narragansett, RI and Diane Nacci, Science Applications International Corporation, ORD Narragansett, RI and
- b) Tropical Collector Urchin, *Tripneustes gratilla*, Fertilization Test Method. April, 2012. Amy Wagner, U.S. EPA, Region 9 Laboratory, Richmond, CA and Diane Nacci, U.S. EPA, Office of Research and Development National Health and Environmental Effects Research Laboratory, Atlantic Ecology Division, Narragansett, RI (EPA/600/R-12/022).

I'm wondering if the labs are actually following the previous draft method (1998) or the peer-reviewed method (2012). If there is a re-opener, that is a pretty important method citation to correct. The biggest difference is that the old methods required a 2500:1 sperm:egg ratio, and the new method requires sperm trials with a S:E ratio based on the trail.

- 2) Since the Navy's permits are a mixture of method a) and b), have they been required (or requested themselves) to use the newer peer-reviewed method for all permits? The newer permits using method (b) are so recent that it will be difficult for me to see QC trends. So I guess my question is do you want me to evaluate how they running the current (2012) method by watching them conduct the tests real-time and look at historical data to evaluate quality control?
- 3) Are you only interested in me evaluating the labs' capabilities to conduct *T. gratilla* tests? I noticed that Navy has a permit that is using the chronic marine methods. I'm assuming they are using a mainland lab to conduct their tests and I won't be evaluating those methods. I can also look at the Navy's *Ceriodaphnia dubia* data and lab techniques for permit 0110086 if you would like.

Thanks, Amy ***********

Amy Wagner
Marine Biologist
USEPA Region 9 Laboratory
1337 S. 46th St., Bldg. 201
Richmond, CA 94804
W (510) 412-2329
F (510) 412-2302
wagner.amy@epa.gov

http://www.epa.gov/region09/lab/

From: Lum, Darryl C darryl.lum@doh.hawaii.gov

Sent: Thursday, January 16, 2014 2:07 PM

To: Sablad, Elizabeth

Subject: RE: Agreements/follow-up actions for your review

Hi Elizabeth,

Everything looks good. I asked Marianne to email you our consistency document.

We did forget to bring up the limit set issue. Due to restrictions in our database, the CWB Engineers will be inputting the limit sets into our database, which will flow to ICIS. Due to this additional work and the learning curve, ICIS may not be updated as quickly as before.

Please see below in **green** for draft timeframes. I made this up. Glenn and I are meeting with Myron next week Tuesday to go over the draft revisions to our WQS. After that we'll need to run the draft by Alec, Watson, and Ted. I think if we could get the intake credit examples soon that would be helpful. Also, our priority is the standard water quality assessment methodology.

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Wednesday, January 15, 2014 8:44 AM

To: Lum, Darryl C

Subject: Agreements/follow-up actions for your review

Hi Darryl,

Can you review these and let me know if I mischaracterized anything? We should also think about timeframes for holding these sessions. Any thoughts would be appreciated! Thanks!!

-Elizabeth

Key agreements:

- a. DOH will reissue FY13 and earlier carryover major permits (Honouliuli, Sand Island, Kailua, Chevron, MCB Kaneohe Bay, and Hilo) no later than September 30, 2014.
- b. DOH will review contract schedule and adhere more closely to agreed-upon turn-around times for permit deliverables.
- c. DOH will issue permits included in the FY14 Permit Issuance Schedule.

Follow-up meetings/actions:

a. Potential Maui MS4 designation scope and process: DOH/EPA will hold follow-up discussion. April 2014

- b. Navy petition on WQS: DOH/EPA will hold follow-up discussion, including WQS staff. April 2014
- c. Permit Writer's Training: EPA will determine process/logistics of hosting a training and provide to DOH. **February 2014**
- d. Fact Sheet Development Review and Q &A: March 2014
 - 1. DOH will provide draft consistency document to EPA for review.
 - 2. DOH/EPA will hold follow-up discussion.
- e. Guidance on reviewing ZOM/dilution studies April 2014
 - 1. EPA will send DOH guidance document.
 - 2. DOH/EPA will hold follow-up discussion.
- f. Intake credit policy and implementation examples January or early February 2014
 - 1. EPA will provide DOH examples.
 - 2. DOH/EPA will hold follow-up discussion, including WQS staff.
- g. Permit as a shield: DOH/EPA will hold follow-up discussion, including enforcement staff. March 2014

Spring Working Meetings/Workshops: Begin discussion ending of January or early February 2014

- a. Standard water quality assessment methodology and how consistent sampling/monitoring frequencies should be set to demonstrate compliance with all components of WQS.
- b. System to enforce HAR 11-54 and 11-55 requirements, including "unpermitted discharges": including WQS, Enforcement, and ORC staff.

Sent: Wednesday, January 15, 2014 10:44 AM

To: Lum, Darryl C

Subject: Agreements/follow-up actions for your review

Hi Darryl,

Can you review these and let me know if I mischaracterized anything? We should also think about timeframes for holding these sessions. Any thoughts would be appreciated! Thanks!!

-Elizabeth

Key agreements:

- a. DOH will reissue FY13 and earlier carryover major permits (Honouliuli, Sand Island, Kailua, Chevron, MCB Kaneohe Bay, and Hilo) no later than September 30, 2014.
- b. DOH will review contract schedule and adhere more closely to agreed-upon turn-around times for permit deliverables.
- c. DOH will issue permits included in the FY14 Permit Issuance Schedule.

Follow-up meetings/actions:

- a. Potential Maui MS4 designation scope and process: DOH/EPA will hold follow-up discussion.
- b. Navy petition on WQS: DOH/EPA will hold follow-up discussion, including WQS staff.
- c. Permit Writer's Training: EPA will determine process/logistics of hosting a training and provide to DOH.
- d. Fact Sheet Development Review and Q &A:
 - 1. DOH will provide draft consistency document to EPA for review.
 - 2. DOH/EPA will hold follow-up discussion.
- e. Guidance on reviewing ZOM/dilution studies
 - 1. EPA will send DOH guidance document.
 - 2. DOH/EPA will hold follow-up discussion.
- f. Intake credit policy and implementation examples
 - 1. EPA will provide DOH examples.
 - 2. DOH/EPA will hold follow-up discussion, including WQS staff.
- g. Permit as a shield: DOH/EPA will hold follow-up discussion, including enforcement staff.

Spring Working Meetings/Workshops:

- a. Standard water quality assessment methodology and how consistent sampling/monitoring frequencies should be set to demonstrate compliance with all components of WQS.
- b. System to enforce HAR 11-54 and 11-55 requirements, including "unpermitted discharges": including WQS, Enforcement, and ORC staff.

Sent: Friday, December 13, 2013 8:35 AM To: Lum, Darryl C; Poentis, Kris T

Subject: EPA Comments on Honouliuli WWTP public-noticed permit

Attachments: EPA Comments on Honouliuli WWTP.pdf

Hi Darryl and Kris,

Please see our attached comments on the public-noticed draft Honouliuli WWTP permit.

Have a great weekend! Elizabeth

From: Chew, Sandra

Sent: Tuesday, November 05, 2013 8:57 AM

To: Bose, Laura (Separated); Greenberg, Ken; Kozelka, Peter; Marincola, JamesPaul; Mues,

Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn; Tran, Linh; Wampler,

David; Whitson, Amelia; Woo, Abraham Morimoto, Kaoru; PERKINS, SUSANNE

Subject: Nov. - Water Monthly Reports

Attachments: CA Permit Summary Report (PSTS).xls; R9 -WTR5 Monthly Permit Status Summary

Report.xls; List of Monthly ICIS-NPDES Rpts.xlsx; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Tracker

(Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued

Permits Tracker.xls; PI EPA Issued Permits Tracker.xls; Tribal EPA Issued Permits

Tracker.xls; EPA Issued Permits Expiring in 9 Months.xls

Hi Everyone,

Cc:

Attached are the most recent monthly reports for Nov. 2013. Please note that AZ is still not updated with current data due to their continuous efforts to batch their State data into ICIS.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

Sent: Wednesday, October 30, 2013 8:16 AM

To: Poentis, Kris T; Dan Connally

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

Sounds good. Talk to you then.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, October 29, 2013 5:39 PM **To:** Sablad, Elizabeth; Dan Connally

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

Hi Elizabeth and Dan,

I'm sorry I forgot to respond to this email. If it is still good for you both, Wednesday at 10 am HST is good for us. At the same time, can we talk about Chevron? Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 8:41 AM

To: Dan Connally; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

Works for me.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

<u>oublice::enzapeericepu.gov</u>

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Thursday, October 24, 2013 11:40 AM

To: Sablad, Elizabeth; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

I'd like to propose Wednesday at 10:00 AM HST. This will provide me with sufficient time to review the comments prior to the call. Please let me know if this time works for you, if so, I'll send out the call in information early next week.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 2:36 PM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

Wow, you are in early! I can do 7am HST tomorrow, and I'm also available next week if you want more time to address the comments prior to the call. Let me know.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Thursday, October 24, 2013 11:28 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

We are available tomorrow morning from 7-8:30 am HST and any time next week, Tuesday – Friday.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 5:40 AM

To: Poentis, Kris T

Cc: Lum, Darryl C: Dan Connally

Subject: Comments on revised draft Sand Island WWTP

Hi All,

As promised, attached are my comments on the revised draft for Sand Island WWTP. I found some inconsistencies between Sand Island and Honouliuli, so there are some comments to be addressed in the Honouliuli permit as well. Please let me know when you would like to discuss these comments.

Sincerely, Elizabeth

Sent: Thursday, October 24, 2013 11:41 AM

To: Dan Connally; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

Works for me.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Thursday, October 24, 2013 11:40 AM

To: Sablad, Elizabeth; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Comments on revised draft Sand Island WWTP

I'd like to propose Wednesday at 10:00 AM HST. This will provide me with sufficient time to review the comments prior to the call. Please let me know if this time works for you, if so, I'll send out the call in information early next week.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 2:36 PM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

Wow, you are in early! I can do 7am HST tomorrow, and I'm also available next week if you want more time to address the comments prior to the call. Let me know.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Thursday, October 24, 2013 11:28 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

We are available tomorrow morning from 7-8:30 am HST and any time next week, Tuesday – Friday.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 5:40 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: Comments on revised draft Sand Island WWTP

Hi All,

As promised, attached are my comments on the revised draft for Sand Island WWTP. I found some inconsistencies between Sand Island and Honouliuli, so there are some comments to be addressed in the Honouliuli permit as well. Please let me know when you would like to discuss these comments.

Sincerely, Elizabeth

Sent: Thursday, October 24, 2013 11:36 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

Wow, you are in early! I can do 7am HST tomorrow, and I'm also available next week if you want more time to address the comments prior to the call. Let me know.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Thursday, October 24, 2013 11:28 AM

To: Sablad, Elizabeth

Cc: Lum, Darryl C; Dan Connally

Subject: RE: Comments on revised draft Sand Island WWTP

We are available tomorrow morning from 7-8:30 am HST and any time next week, Tuesday – Friday.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Thursday, October 24, 2013 5:40 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: Comments on revised draft Sand Island WWTP

Hi All,

As promised, attached are my comments on the revised draft for Sand Island WWTP. I found some inconsistencies between Sand Island and Honouliuli, so there are some comments to be addressed in the Honouliuli permit as well. Please let me know when you would like to discuss these comments.

Sincerely, Elizabeth

Sent: Thursday, October 24, 2013 11:23 AM

To: Mues, Pascal Cc: Smith, DavidW

Subject: Updated ICIS lists for HI Permit Issuance Attachments: HI Sept ICIS report with ES edits.xls

Hi Pascal,

Attached is the September 2013 ICIS report for HI Permit Issuance, updated with my comments. I included both issued and effective dates for those recently issued, or those not updated in ICIS. I deleted the tabs with stormwater permits, since HQ does not use that information. For the general permits tab, I noted which were stormwater permits. You can ask Sandra for a report of the NOIs under each of the non-stormwater GPs, but note that all GPs, except the Pesticide GP (which is missing in ICIS), are expired. Let me know if you have any questions.

-Elizabeth

Sent: Thursday, October 24, 2013 8:40 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: Comments on revised draft Sand Island WWTP

Attachments: Comments on Sand Island WWTP rev draft 10_24_13.doc

Hi All,

As promised, attached are my comments on the revised draft for Sand Island WWTP. I found some inconsistencies between Sand Island and Honouliuli, so there are some comments to be addressed in the Honouliuli permit as well. Please let me know when you would like to discuss these comments.

Sincerely, Elizabeth

From: Pascua, Noralin F noralin.pascua@doh.hawaii.gov

Sent: Wednesday, October 23, 2013 1:08 PM

To: Sablad, Elizabeth; dan.connally@pgenv.com; jlum1@honolulu.gov

Cc: Poentis, Kris T

Subject: Public Notice Package - Permit No. HI 0020877 - Honouliuli Wastewater Treatment Plant Attachments: 0020877-10077PKP.13.PDF; 10077PKP.13a.doc; 10077PKP.13b.pdf; 10077PKP.13c.pdf

Hi All,

Please see attached documents for your use/file.

If you have any questions, please contact Ms. Kris Poentis at (808) 586-4309.

Thanks,

Nora

DOH-CWB

From: Dan Connally <u><dan.connally@pgenv.com></u>
Sent: Tuesday, October 22, 2013 1:00 PM
To: Sablad, Elizabeth; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Informal comments on Kailua WWTP - let's discuss

Attachments: 09043PKP 13c - Kailua FS 10-22-13.doc; 09043PKP 13b Kailua 10-22-13.doc; Kailua RW

Nutrient Data 2008-2012 - PG Version (10-22-13).xls

Hello all, I have made some edits based on the previously provided comments. Please see the attached for my changes in tracked changes.

Informal comments on Kailua WWTP public-notice permit:

- 1. Finalizing permits for permittee/public review: please remember to remove any comments/highlights from all documents prior to release to permittee. For DOH.
- 2. Footnote 1 on page 3 incorrectly states the mass-based limits are based on a flow of 38 MGD. This should be 12.7 MGD. Please double-check mass-based limits were calculated correctly. I couldn't locate this on the version I have, I'm probably not looking in the right location.
- 3. Page 6: remove language regarding obtaining gametes, since this is not a problem anymore. Done.
- 4. Page 7: remove use of receiving water for dilution water. Only lab dilution water should be used. Done.
- 5. Page 17: the offshore monitoring should be linked to the ZOM limits, as discussed on Honouliuli. Done.
- 6. Fact Sheet, page 5: use 2012 303(d) list. Updated to reflect new 2012 303(d) list approved on September 20th. Nothing but the dates changed.
- 7. Fact Sheet, page 21: typos in first and second paragraph. Should read "ammonia," not "nitrate+nitrite." Fixed.
- 8. Fact Sheet, page 23: oil and grease justification must match permit requirements and backsliding must be addressed if removing previous effluent limits. I'm not sure I understand this comment, the previous permit does not appear to have had a limit for o/g.
- 9. Fact Sheet, page 23-24: cite portion of EPA regulation that specifies criteria for entero are applicable to Hawaii.

 Done.
- 10. Fact Sheet, page 24: how were the enterococcus WQBELs calculated? I am not getting the same numbers. Please double-check calculations. Limit = criteria + dilution (criteria background). However in HI we just assume all full assimilative capacity, so limit = criteria + dilution (criteria).
- 11. Fact Sheet, page 26: cites the draft T. gratilla method. Should cite published method. I believe we did this, but we mistakenly kept an older date in the reference that I removed. We do cite EPA/600/R-12/022. I believe that is the intent of the comment, but I may be mistaken.
- 12. Fact Sheet, Table F-11: not clear how geomean of ammonia at M6 is so much higher than the annual geomeans used for assimilative capacity assessment based on the information provided in the footnotes. Please explain. The geomean for the assimilative capacity is the geomean for both MB1 and MB6 (both control stations). However, there were errors in this section that I have fixed. We ran into this with MCBK as well. The stations had not been sorted correctly for MB4 through MB6 and are fixed in the attached file (same as MCBK).

13. Let's discuss whether or not it is appropriate to use the 15.25 MGD to establish mass-based limits for chlordane and dieldrin. Still open for discussion.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Hui, Siu Mei [mailto:siumei.hui@doh.hawaii.gov]

Sent: Friday, September 20, 2013 5:03 PM

To: Sablad, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov

Cc: Poentis, Kris T

Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296

Dear All,

Please see attached files for Kailua Refional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

- 1) Transmittal letter
- Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

From: Dan Connally dan.connally@pgenv.com
Sent: Tuesday, October 22, 2013 10:06 AM

To: Dan Connally; Poentis, Kris T; Sablad, Elizabeth

Cc: Lum, Darryl C

Subject: RE: Informal comments on Kailua WWTP - let's discuss

Sorry guys, time corrected to 10:30 AM (HST).

Date:10/22/2013 (today) Time: 10:30 am (HST) Number: 1-866-394-4146

Code: 91711087#

Talk to you all soon,

Dan Connally

PG Environmental, LLC

570 Herndon Parkway, Suite 500 Herndon, VA 20170 703-707-8258, ext. 102 (phone) 703-707-8259 (fax)

Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Tuesday, October 22, 2013 1:03 PM **To:** Dan Connally; Sablad, Elizabeth

Cc: Lum, Darryl C

Subject: RE: Informal comments on Kailua WWTP - let's discuss

Ok – today 10:30 HST is good for both Darryl and I. Hopefully it will be quick so Dan can leave. Thanks!

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Tuesday, October 22, 2013 6:38 AM **To:** Sablad, Elizabeth; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Informal comments on Kailua WWTP - let's discuss

I'm available all day today and tomorrow as well, although once again I need to leave right at 5PM this evening (promise this is the last day for awhile). If you let me know a good date and time I'll set up the call.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 6:23 PM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally

Subject: Informal comments on Kailua WWTP - let's discuss

Hi Kris,

Below are my informal comments on the public-notice permit for Kailua WWTP. Please do not formally respond to these comments. I would like to set up a call to discuss them with you and Dan prior to the end of the comment period. Could you confirm for me the last day of the comment period? I'm available tomorrow from 10:30am – 12:30 HST or pretty much anytime on Wednesday.

Thanks, Elizabeth

Informal comments on Kailua WWTP public-notice permit:

- 1. Finalizing permits for permittee/public review: please remember to remove any comments/highlights from all documents prior to release to permittee.
- 2. Footnote 1 on page 3 incorrectly states the mass-based limits are based on a flow of 38 MGD. This should be 12.7 MGD. Please double-check mass-based limits were calculated correctly.
- 3. Page 6: remove language regarding obtaining gametes, since this is not a problem anymore.
- 4. Page 7: remove use of receiving water for dilution water. Only lab dilution water should be used.
- 5. Page 17: the offshore monitoring should be linked to the ZOM limits, as discussed on Honouliuli.
- 6. Fact Sheet, page 5: use 2012 303(d) list.
- 7. Fact Sheet, page 21: typos in first and second paragraph. Should read "ammonia," not "nitrate+nitrite."
- 8. Fact Sheet, page 23: oil and grease justification must match permit requirements and backsliding must be addressed if removing previous effluent limits.
- 9. Fact Sheet, page 23-24: cite portion of EPA regulation that specifies criteria for entero are applicable to Hawaii.
- 10. Fact Sheet, page 24: how were the enterococcus WQBELs calculated? I am not getting the same numbers. Please double-check calculations.
- 11. Fact Sheet, page 26: cites the draft T. gratilla method. Should cite published method.
- 12. Fact Sheet, Table F-11: not clear how geomean of ammonia at M6 is so much higher than the annual geomeans used for assimilative capacity assessment based on the information provided in the footnotes. Please explain.
- 13. Let's discuss whether or not it is appropriate to use the 15.25 MGD to establish mass-based limits for chlordane and dieldrin.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Hui, Siu Mei [mailto:siumei.hui@doh.hawaii.gov]

Sent: Friday, September 20, 2013 5:03 PM

To: Sablad, Elizabeth; dan.connally@pgenv.com; cjaramilla@honolulu.gov; bwienand@honolulu.gov

Cc: Poentis, Kris T

Subject: Notice of Proposed Water Pollution Control Permit for Kailua Regional Treatment PLant - HI 0021296

Dear All,

Please see attached files for Kailua Refional Treatment Plant of Honolulu, Hawaii. Permit No. HI 0021296

- 1) Transmittal letter
- 2) Public Notices NPDES Permit

If you have any questions, please contact Ms. Kris Poentis of the Engineering Section, CWB, at 586-4309.

Best Regards

Rebecca Hui

From: Dan Connally dan.connally@pgenv.com
Sent: Monday, October 21, 2013 12:28 PM

To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Attachments: Honouliuli WWTP_HI0020117_10-21-2013_Admin Draft Permit.doc; Honouliuli

WWTP_HI0020117_10-21-2013_Admin Draft Fact Sheet.docx

Hello All,

I just made a few quick edits based on the latest comments, obviously these may be revised based on our discussion today. These are just how I would go about addressing the comments (all in tracked changes, with the exception of No. 4 which I have highlighted yellow in the table). I did not address Comment No. 5 in these revisions and will wait for our discussion to determine if (or what) additional revisions are necessary.

Thanks,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 2:48 PM **To:** Poentis, Kris T; Dan Connally; Lum, Darryl C **Subject:** RE: Comments on Honouliuli WWTP

Works for me. Talk to you then!

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:47 AM

To: Dan Connally; Sablad, Elizabeth; Lum, Darryl C **Subject:** RE: Comments on Honouliuli WWTP

10 am is good with us.

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Monday, October 21, 2013 8:45 AM

To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C **Subject:** RE: Comments on Honouliuli WWTP

I can do 10 am HST today, however I need to leave at 5pm (11 am HST) today for another commitment. Please let me know if 10am (HST) works.

If this works, the call-in information will be as follows:

Date:10/21/2013 (today) Time: 10 am (HST)

Number: 1-866-394-4146

Code: 91711087#

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 2:41 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

How about today at 10am or 11am HST?

-Flizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that diution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

Sablad, Elizabeth From:

Monday, October 21, 2013 11:48 AM Sent:

Poentis, Kris T; Dan Connally; Lum, Darryl C To: Subject: RE: Comments on Honouliuli WWTP

Works for me. Talk to you then!

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:47 AM

To: Dan Connally; Sablad, Elizabeth; Lum, Darryl C Subject: RE: Comments on Honouliuli WWTP

10 am is good with us.

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Monday, October 21, 2013 8:45 AM

To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

I can do 10 am HST today, however I need to leave at 5pm (11 am HST) today for another commitment. Please let me know if 10am (HST) works.

If this works, the call-in information will be as follows:

Date:10/21/2013 (today) Time: 10 am (HST)

Number: 1-866-394-4146

Code: 91711087#

Thank you,

Dan Connally

PG Environmental, LLC

570 Herndon Parkway, Suite 500 Herndon, VA 20170 703-707-8258, ext. 102 (phone) 703-707-8259 (fax) Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 2:41 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

How about today at 10am or 11am HST?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has

RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.

- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments below. Thanks!

Kris

Poentis, Kris T kris.poentis@doh.hawaii.gov From:

Monday, October 21, 2013 11:47 AM Sent:

Dan Connally; Sablad, Elizabeth; Lum, Darryl C To:

RE: Comments on Honouliuli WWTP Subject:

10 am is good with us.

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Monday, October 21, 2013 8:45 AM

To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C Subject: RE: Comments on Honouliuli WWTP

I can do 10 am HST today, however I need to leave at 5pm (11 am HST) today for another commitment. Please let me know if 10am (HST) works.

If this works, the call-in information will be as follows:

Date:10/21/2013 (today) Time: 10 am (HST)

Number: 1-866-394-4146

Code: 91711087#

Thank you,

Dan Connally PG Environmental, LLC 570 Herndon Parkway, Suite 500 Herndon, VA 20170 703-707-8258, ext. 102 (phone) 703-707-8259 (fax) Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 2:41 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

How about today at 10am or 11am HST?

-Elizabeth

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Dan Connally dan.connally@pgenv.com
Sent: Monday, October 21, 2013 11:45 AM

To: Sablad, Elizabeth; Poentis, Kris T; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

I can do 10 am HST today, however I need to leave at 5pm (11 am HST) today for another commitment. Please let me know if 10am (HST) works.

If this works, the call-in information will be as follows:

Date:10/21/2013 (today) Time: 10 am (HST) Number: 1-866-394-4146

Code: 91711087#

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Monday, October 21, 2013 2:41 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

How about today at 10am or 11am HST?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks! Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105

(415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Sablad, Elizabeth

Sent: Monday, October 21, 2013 11:41 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

How about today at 10am or 11am HST?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested.

 There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*

- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Monday, October 21, 2013 11:40 AM

To: Sablad, Elizabeth

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Elizabeth and Dan,

Please let us know when you are available so we can set up a meeting. Thanks!

Kris

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 11:42 AM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris.

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to

this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. *Should be 40 CFR 122.47(a)*(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Dan Connally dan.connally@pgenv.com
Sent: Monday, October 21, 2013 7:34 AM
To: Sablad, Elizabeth; Poentis, Kris T

Cc: Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Sorry if I've already sent a response (my email is having problems this morning, I can't tell if my previous email went through), but if you just let me know a date and time I'll be happy to set up a conference call.

Thank you,

Dan Connally
PG Environmental, LLC
570 Herndon Parkway, Suite 500
Herndon, VA 20170
703-707-8258, ext. 102 (phone)
703-707-8259 (fax)
Dan.Connally@pgenv.com

Visit our website at www.pgenv.com

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, October 18, 2013 5:42 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for

many facilities, we do not have that diution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. *Let's discuss*.

6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth.

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Sablad, Elizabeth

Sent: Friday, October 18, 2013 2:42 PM

To: Poentis, Kris T

Cc: Dan Connally; Lum, Darryl C

Subject: RE: Comments on Honouliuli WWTP

Attachments: Honouliuli WWTP_HI0020117_10-9-2013_Admin Draft Permit.doc; Honouliuli

WWTP_HI0020117_10-9-2013_Admin Draft Fact Sheet.docx

Hi Kris.

If you have some time Monday or Tuesday, I'd like to go over the following comments/responses. Let me know when you would be available for a call. Have a good weekend!

- 1. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested. There is still a paragraph on this. I think there were two before. Let's discuss.
- 2. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW. *Let's discuss*.
- 3. Page 47: please change DMR submittal to the 28th day. Revised as requested. *Still the 15th in paragraph above table.*
- 4. Fact Sheet, Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up. I would still like the dilution factor footnoted for each parameter, since this makes it much easier to follow and more transparent.
- 5. Fact Sheet, Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work. Let's discuss.
- 6. Fact Sheet, Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible. Should be 40 CFR 122.47(a)(1).

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105

(415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments

below. Thanks!

Kris

From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Wednesday, October 09, 2013 4:26 PM

To: Sablad, Elizabeth Cc: Lum, Darryl C

Subject: FW: Comments on Honouliuli WWTP

Attachments: Honouliuli WWTP_HI0020117_10-9-2013_Admin Draft Permit.doc; Honouliuli

WWTP_HI0020117_10-9-2013_Admin Draft Fact Sheet.docx

Hi Elizabeth,

Attached are the revised draft permit and fact sheet. Please see our responses to your comments below. Thanks!

Kris

Comments on draft Honouliuli WWTP permit:

Permit:

- 1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.) Revised as requested.
- 2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table. Revised as requested.
- 3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable. Revised as requested.
- 4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions. Revised as requested.
- 5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017. Revised as requested.
- 6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Revised as requested.
- 7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA. Revised as requested.
- 8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations. Also, the discussion of salt use should be removed, since not applicable. Revised as requested.
- 9. Pages 9 and 10 remove "or trigger" from accelerated testing language. Revised as requested.
- 10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, <u>including</u>:" Revised as requested.
- 11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? This section was not revised. The Permittee would not like it because of other contributing factors in the receiving water. In addition, our Enforcement Section generally does not enforce RW.

- 12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement. Sand Island justification will be revised to match Honouliuli.
- 13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over. Revised as requested.
- 14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL. Revised as requested.
- 15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted. Revised as requested.
- 16. Page 47: please change DMR submittal to the 28th day. Revised as requested.
- 17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements. Revised as requested.

Fact Sheet:

- 18. Page 5: recommend use of recently approved 2012 303(d) list. Revised as requested.
- 19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data? Dan scanned through the more recent data and determined it would not change any of the conclusions.
- 20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs? They have not performed a TRI/TIE. They submitted a plan back in 2009, but say they are awaiting DOH and EPA approval. This is in our most recent CEI report (and may be in earlier reports as well).
- 21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Dan added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up.
- 22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct? Yes, only annual sampling.
- 23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify. Clarified as reqested.
- 24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia. Revised as requested.
- 25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7? Revised as requested.

- 26. Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Darryl and Dan discussed this and have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work.
- 27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii. Revised as requested.
- 28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule. Additional text was added to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible.
- 29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify. This section was added in the permit. We feel that it would be a good idea to keep this section until they achieve secondary treatment.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

Kris

From: Lum, Darryl C <a href="m

Sent: Monday, October 07, 2013 2:47 PM To: Poentis, Kris T; Dan Connally

Cc: Sablad, Elizabeth

Subject: RE: Comments on Honouliuli WWTP

Hi Kris,

Please ask Jared from CCH for the data. His email is jlum1@honolulu.gov. Sorry, I lost his phone number.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Poentis, Kris T

Sent: Monday, October 07, 2013 7:18 AM

To: Dan Connally

Cc: Lum, Darryl C; Elizabeth Sablad

Subject: RE: Comments on Honouliuli WWTP

Thanks Dan!

I could only get you data that we have in our system because I couldn't find the hard copies. Our clerical only recently started scanning entire DMR submissions. In the past, there were file size issues with our mail system and thus they only scanned the DMR data at the most. In addition, OTIS/ECHO is down because of the government shutdown. We could possibly get the priority pollutants from OTIS/ECHO but not the receiving water data.

Darryl – should we go with what we have? Thanks! Kris

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Monday, October 07, 2013 5:07 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Elizabeth Sablad

Subject: RE: Comments on Honouliuli WWTP

Hey Kris,

Attached are the revised permit and FS for Honouliuli WWTP. See my responses below in green. Please feel free to call with any questions. Please note as I stated in my previous email, I didn't see any additional priority pollutant data in the data you sent along. Please confirm there is no additional data. If there is additional data, please send it along, and I'll be happy to update the RPA results.

Comments on draft Honouliuli WWTP permit:

Permit:

- 1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.)
- 2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table.
- 3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable.
- 4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions. DONE.
- 5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017. DONE
- 6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Dan do you see any problems with deleting this language? would keep until we know for sure. Doesn't hurt to keep text, but could cause a problem if we remove.
- 7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA.
- 8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations.

 DONE Also, the discussion of salt use should be removed, since not applicable. I deleted the salt language but not sure if we should change this. OK.
- 9. Pages 9 and 10 remove "or trigger" from accelerated testing language.
- 10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, including:"
- 11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? I don't think this is necessary and may cause a bit of a backlash from the Permittee's to add this type of text because of other contributing factors in the receiving water. It would be best to run this idea by Matt, since it will be enforcement that will actually be dealing with it. As I understand it, they do not enforce RW exceedances (much like most states), because it's nearly impossible to demonstrate that the exceedance was caused by the Permittee. I'll be happy to do whatever it is we eventually decide, just need DOH direction here.
- 12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement. We will have to revise Sand Island.

- 13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over. I have changed the due date for the annual report. DOH will have to decide if you want to continue semi-annual reporting, I have kept it in for now.
- 14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL.
- 15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted.
- 16. Page 47: please change DMR submittal to the 28th day.
- 17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements.

Fact Sheet:

- 18. Page 5: recommend use of recently approved 2012 303(d) list.
- 19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data? No additional priority pollutant data provided. I looked through the new data you sent earlier, and did not see any new PP data. Please confirm we have all the data. I updated tables with the available data where I could. For toxicity, I had actual data all the way through December 2012 from my CEI report, so I updated the compliance section to reflect the data I had.
- 20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs? They have not performed a TRI/TIE. They submitted a plan back in 2009, but say they are awaiting DOH and EPA approval. This is in our most recent CEI report (and may be in earlier reports as well).
- 21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up.
- 22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct? Yes, only annual sampling.
- 23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify. Clarified.
- 24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia.
- 25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7? Yes, typo.
- 26. Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many

facilities, we do not have that diution factor. This would change the WQBELs for ammonia. Based on my discussion with Darryl, we have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work.

- 27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii. DONE.
- 28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible."

 This is still doable with the constraints of the consent decree schedule. | added additional text to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible.
- 29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify. Added, but I feel like we deleted this because they no longer need to do 310(h) waiver monitoring. It's probably a good idea to keep until they are at secondary anyway. Feel free to call me to discuss if you'd like.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

Kris

From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Monday, October 07, 2013 10:18 AM

To: Dan Connally

Cc: Lum, Darryl Č; Sablad, Elizabeth Subject: RE: Comments on Honouliuli WWTP

Thanks Dan!

I could only get you data that we have in our system because I couldn't find the hard copies. Our clerical only recently started scanning entire DMR submissions. In the past, there were file size issues with our mail system and thus they only scanned the DMR data at the most. In addition, OTIS/ECHO is down because of the government shutdown. We could possibly get the priority pollutants from OTIS/ECHO but not the receiving water data.

Darryl – should we go with what we have? Thanks! Kris

From: Dan Connally [mailto:dan.connally@pgenv.com]

Sent: Monday, October 07, 2013 5:07 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Elizabeth Sablad

Subject: RE: Comments on Honouliuli WWTP

Hey Kris,

Attached are the revised permit and FS for Honouliuli WWTP. See my responses below in green. Please feel free to call with any questions. Please note as I stated in my previous email, I didn't see any additional priority pollutant data in the data you sent along. Please confirm there is no additional data. If there is additional data, please send it along, and I'll be happy to update the RPA results.

Comments on draft Honouliuli WWTP permit:

Permit:

- 1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.)
- 2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table.
- 3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable.
- 4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions. DONE.
- 5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017. DONE
- 6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Dan do you see any

problems with deleting this language? I would keep until we know for sure. Doesn't hurt to keep text, but could cause a problem if we remove.

- 7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA.
- 8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations.

 DONE. Also, the discussion of salt use should be removed, since not applicable. I deleted the salt language but not sure if we should change this. OK.
- 9. Pages 9 and 10 remove "or trigger" from accelerated testing language.
- 10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, including:"
- 11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? I don't think this is necessary and may cause a bit of a backlash from the Permittee's to add this type of text because of other contributing factors in the receiving water. It would be best to run this idea by Matt, since it will be enforcement that will actually be dealing with it. As I understand it, they do not enforce RW exceedances (much like most states), because it's nearly impossible to demonstrate that the exceedance was caused by the Permittee. I'll be happy to do whatever it is we eventually decide, just need DOH direction here.
- 12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement. We will have to revise Sand Island.
- 13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over. I have changed the due date for the annual report. DOH will have to decide if you want to continue semi-annual reporting, I have kept it in for now.
- 14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL.
- 15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted.
- 16. Page 47: please change DMR submittal to the 28th day.
- 17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements.

Fact Sheet:

- 18. Page 5: recommend use of recently approved 2012 303(d) list.
- 19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data? No additional priority pollutant data provided. I looked through the new data you sent earlier, and did not see any new PP data. Please confirm we have all the data. I updated tables with the available data where I could. For toxicity, I had actual

data all the way through December 2012 from my CEI report, so I updated the compliance section to reflect the data I had.

- 20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs? They have not performed a TRI/TIE. They submitted a plan back in 2009, but say they are awaiting DOH and EPA approval. This is in our most recent CEI report (and may be in earlier reports as well).
- 21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up.
- 22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct? Yes, only annual sampling.
- 23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify. Clarified
- 24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia.
- 25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7? Yes, typo.
- 26. Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Based on my discussion with Darryl, we have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work.
- 27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii. DONE.
- 28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible."

 This is still doable with the constraints of the consent decree schedule. added additional text to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible.
- 29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify. Added, but I feel like we deleted this because they no longer need to do 310(h) waiver monitoring. It's probably a good idea to keep until they are at secondary anyway. Feel free to call me to discuss if you'd like.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

Kris

From: Dan Connally dan.connally@pgenv.com
Sent: Monday, October 07, 2013 8:07 AM

To: Poentis, Kris T

Cc: Lum, Darryl C; Sablad, Elizabeth Subject: RE: Comments on Honouliuli WWTP

Attachments: Honouliuli WWTP_HI0020117_10-7-2013_Admin Draft Permit.doc; Honouliuli

WWTP_HI0020117_10-7-2013_Admin Draft Fact Sheet.docx

Hey Kris,

Attached are the revised permit and FS for Honouliuli WWTP. See my responses below in green. Please feel free to call with any questions. Please note as I stated in my previous email, I didn't see any additional priority pollutant data in the data you sent along. Please confirm there is no additional data. If there is additional data, please send it along, and I'll be happy to update the RPA results.

Comments on draft Honouliuli WWTP permit:

Permit:

- 1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.)
- 2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table.
- 3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable.
- 4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions. **DONE**
- 5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017. DONE
- 6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore. Dan do you see any problems with deleting this language? would keep until we know for sure. Doesn't hurt to keep text, but could cause a problem if we remove.
- 7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA.
- 8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations.

 DONE. Also, the discussion of salt use should be removed, since not applicable. I deleted the salt language but not sure if we should change this. OK.
- 9. Pages 9 and 10 remove "or trigger" from accelerated testing language.
- 10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, including:"

- 11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring? I don't think this is necessary and may cause a bit of a backlash from the Permittee's to add this type of text because of other contributing factors in the receiving water. It would be best to run this idea by Matt, since it will be enforcement that will actually be dealing with it. As I understand it, they do not enforce RW exceedances (much like most states), because it's nearly impossible to demonstrate that the exceedance was caused by the Permittee. I'll be happy to do whatever it is we eventually decide, just need DOH direction here.
- 12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement. We will have to revise Sand Island.
- 13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over. I have changed the due date for the annual report. DOH will have to decide if you want to continue semi-annual reporting, I have kept it in for now.
- 14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL.
- 15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted.
- 16. Page 47: please change DMR submittal to the 28th day.
- 17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements.

Fact Sheet:

- 18. Page 5: recommend use of recently approved 2012 303(d) list.
- 19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data? No additional priority pollutant data provided. I looked through the new data you sent earlier, and did not see any new PP data. Please confirm we have all the data. I updated tables with the available data where I could. For toxicity, I had actual data all the way through December 2012 from my CEI report, so I updated the compliance section to reflect the data I had.
- 20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs? They have not performed a TRI/TIE. They submitted a plan back in 2009, but say they are awaiting DOH and EPA approval. This is in our most recent CEI report (and may be in earlier reports as well).
- 21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum. Added number of samples, however dilution values are discussed in the section prior to the table. Further, dilution is discussed for each parameter that has RP within the limits write up.
- 22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct? Yes, only annual sampling.

- 23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify. Clarified.
- 24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia.
- 25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7? Yes, typo.
- 26. Page 26 per Dan's note if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia. Based on my discussion with Darryl, we have determined that the dilution provided in the dilution study is not representative for nutrients, as it is not a true annual average. Since the limits are applied annually, the ZOM dilution should consider an average annual effluent flow, not the maximum design flow. I will discuss further with Elizabeth when she comes back to work.
- 27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii. DONE.
- 28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible."

 This is still doable with the constraints of the consent decree schedule. | added additional text to this section referencing 40 CFR 122.47(1), and stating that the provided schedule is as soon as possible.
- 29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify. Added, but I feel like we deleted this because they no longer need to do 310(h) waiver monitoring. It's probably a good idea to keep until they are at secondary anyway. Feel free to call me to discuss if you'd like.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth.

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

From: Sablad, Elizabeth

Sent: Monday, September 30, 2013 12:13 PM

To: Poentis, Kris T

Cc: Lum, Darryl C; Dan Connally Subject: Comments on Honouliuli WWTP

Hi Kris,

Please see my comments below on the draft Honouliuli WWTP permit. If there's no shutdown tomorrow (fingers crossed), I'll be around to discuss them, if you like.

Sincerely, Elizabeth

Comments on draft Honouliuli WWTP permit:

Permit:

- 1. Page 3 under section A.1. states "...lasting through the expiration date..." Recommend changing this to "lasting until the expiration date." Recommend this change be applied to interim effluent limits for enterococcus as well on page 5, section 6.a. (instead of through Jan., state until Jan.)
- 2. Page 3, footnote 4 to table needs to be a superscript next to DDT within table. Also, same for footnote 11 next to remaining priority pollutants in table.
- 3. Page 4, section 3 states, "where practicable,..." Recommend removing these words, since second sentence provides flexibility. These words make the permit less enforceable.
- 4. Table 6: The interim milestones in the compliance schedule for enterococcus are not yearly, and according to the CFR, they must be established yearly unless the actions are not readily divisible into yearly stages. If that is the case, progress reports can be included in place of the actions.
- 5. Table 6: Task 3 is missing a deadline. Per the consent decree, it appears this should be January 1, 2017.
- 6. Page 7, WET language: we may want to discuss whether the paragraphs regarding not be able to obtain gametes are still necessary, since Amy Wagner recently told me this was not a problem anymore.
- 7. Page 7, section B.2 cites the draft method (1998 date). It should cite the published method. It also should cite the West Coast methods manual for QA.
- 8. Page 8, section 4.c.: we may want to discuss changing the WET language here regarding dilution water, as recent guidance from Debra is that only lab water should be used (not receiving water) for compliance determinations. Also, the discussion of salt use should be removed, since not applicable.
- 9. Pages 9 and 10 remove "or trigger" from accelerated testing language.
- 10. Page 14, section (4): change "...sources of pollutants, include:" to "...sources of pollutants, including:"
- 11. Page 18: should the offshore monitoring be linked to Part D of the permit? ZOM monitoring?
- 12. Pretreatment requirements: the urban area requirements under 301(h) are carried over. This is probably a good idea, since they are still operating at primary; however, when we discussed the first draft of Sand Island, we

- changed this language. Recommend consistent approach here with both permits. I like the fact sheet justification in Honouliuli for this requirement.
- 13. The Pretreatment report should be submitted February 28th, and the semi-annual reporting requirement is not a requirement now, but DOH may still want to carry that over.
- 14. Page 46: please change ML/MDL language to be consistent with decision on Wailua (ND to be reported as <MDL). I still think this language is California-based since there is discussion of the ML, whereas laboratories use RL.
- 15. Page 46: please change reporting requirements to EPA WTR-2 to be consistent with Wailua/Sand Island permits, including that only receiving water data be submitted.
- 16. Page 47: please change DMR submittal to the 28th day.
- 17. Page 48: please make sure reporting to WTR-2 is consistent with Sand Island requirements.

Fact Sheet:

- 18. Page 5: recommend use of recently approved 2012 303(d) list.
- 19. Data used for RPA through July 2012, which was a year ago. Can we use more recent data?
- 20. Page 7 discusses WET exceedances. Did the permittee conduct any TRE/TIEs?
- 21. Page 16 RPA table: recommend adding a column indicating n (number of samples), so more transparent in how projected maximum concentrations were calculated. Also, recommend footnotes indicating which dilution factor was used for each projected maximum.
- 22. Page 22 states that the annual average effluent concentration is the same as the maximum effluent concentration for dieldrin. Is this correct?
- 23. Page 24 under antibacksliding justification for DDT, seems to indicate previous effluent limits, which is not consistent with the rest of the fact sheet that indicates there were no previous effluent limits. Please clarify.
- 24. Page 24, under ammonia assimilative capacity assessment, states the 303(d) list was reviewed for nitrate + nitrite...this section should be corrected to ammonia.
- 25. Page 24 regarding control stations, there seems to be a typo, since a station of MB7 was listed. Should this be HB7?
- 26. **Page 26 per Dan's note** if we have the dilution at the edge of the ZOM, we need to use that dilution for the RPA and WQBEL for nutrients. The only reason we were approaching things differently was because for many facilities, we do not have that dilution factor. This would change the WQBELs for ammonia.
- 27. Page 26 discussion of applicable enterococcus water quality standards: recommend citing CFR, where it discusses the criteria are applicable to Hawaii.
- 28. Pages 28-29: the compliance schedule discussion lacks justification that the schedule is "as soon as possible." This is still doable with the constraints of the consent decree schedule.
- 29. Page 47 discusses a coral reef survey, but I did not see this in the permit. Please clarify.

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

From: Sablad, Elizabeth

Sent: Friday, September 20, 2013 12:22 PM

To: Poentis, Kris T Cc: Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Kris,

I'll try to get to it you sooner. Thanks!

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 11:59 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Elizabeth,

I assumed that we are operating according to the MOA, but we would really appreciate it if you could comment as soon as you can. © Thanks and have a great weekend!

Kris

p.s. hopefully I will be able to send you Sand Island today or Monday.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, September 20, 2013 8:33 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Kris,

Do I have the usual 2 weeks to review this permit? So, comments by October 4th?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov **From:** Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov] **Sent:** Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth Cc: Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

From: Poentis, Kris T kris.poentis@doh.hawaii.gov

Sent: Friday, September 20, 2013 11:59 AM

To: Sablad, Elizabeth Cc: Sablad, Elizabeth Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Elizabeth,

I assumed that we are operating according to the MOA, but we would really appreciate it if you could comment as soon as you can.

Thanks and have a great weekend!

Kris

p.s. hopefully I will be able to send you Sand Island today or Monday.

From: Sablad, Elizabeth [mailto:Sablad.Elizabeth@epa.gov]

Sent: Friday, September 20, 2013 8:33 AM

To: Poentis, Kris T **Cc:** Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Kris.

Do I have the usual 2 weeks to review this permit? So, comments by October 4th?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

From: Sablad, Elizabeth

Sent: Friday, September 20, 2013 11:33 AM

To: Poentis, Kris T Cc: Lum, Darryl C

Subject: RE: Honouliuli WWTP

Hi Kris,

Do I have the usual 2 weeks to review this permit? So, comments by October 4th?

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov

From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]

Sent: Friday, September 20, 2013 10:50 AM

To: Sablad, Elizabeth **Cc:** Lum, Darryl C

Subject: Honouliuli WWTP

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

Poentis, Kris T kris.poentis@doh.hawaii.gov From:

Friday, September 20, 2013 10:50 AM Sent:

To: Sablad, Elizabeth Lum, Darryl C Cc: Honouliuli WWTP Subject:

Attachments:

Honouliuli WWTP_HI0020117_9-11-2013_Admin Draft Permit.doc; Honouliuli WWTP_HI0020117_9-11-2013_Admin Draft Fact Sheet.docx; consent decree.pdf

Hi Elizabeth,

Please review the attached Honouliuli WWTP draft permit and fact sheet. Thanks!

Chew, Sandra From:

Monday, September 09, 2013 10:32 AM Sent:

Bose, Laura (Separated); Greenberg, Ken; Kozelka, Peter; Marincola, JamesPaul; Mues, To:

Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn; Tran, Linh; Wampler,

David; Whitson, Amelia; Woo, Abraham

Morimoto, Kaoru; Liu, Chun; Christophe, Liliana Cc:

Sept. - Water Monthly Report Subject:

List of Monthly ICIS-NPDES Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 - WTR5 Attachments:

Monthly Permit Status Summary Report.xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits -Non-Tribal.xls; NV State Issued Permits Tracker.xls; PI EPA Issued Permits Tracker.xls;

Tribal EPA Issued Permits Tracker.xls

Attached are the latest Permit monthly reports for Sept. 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ data has NOT been updated since they migrated over to ICIS last year in Dec. If you have any questions, please contact me.

Sandra Chew US EPA Region 9 - Enf-4-1 **75 Hawthorne Street** San Francisco, CA 94105

Phone: 415-972-3335

From: Lum, Darryl C <darryl.lum@doh.hawaii.gov>

Sent: Tuesday, August 06, 2013 1:00 PM

To: Dan Connally

Cc: Sablad, Elizabeth; kris.poentis@doh.hawaii.gov

Subject: FY13 Permits

Hi Dan,

Kris will be on vacation from tomorrow (8/7/13) and return on 8/22/13. Please cc me on any of her permits (Honouliuli WWTP, Sand Island WWTP, Kailua WWTP, Wailua WWTP, and Chevron). While she is out I'll send to EPA for review, send PN package, issue final permit, etc.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health Phone: (808) 586-4309

Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

Sent: Monday, August 05, 2013 10:51 AM

To: Bose, Laura (Separated); Greenberg, Ken; Kozelka, Peter; Marincola, JamesPaul; Mues,

Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn; Tran, Linh; Wampler,

David; Whitson, Amelia; Woo, Abraham

Cc: Hanf, Lisa; Liu, Chun; Christophe, Liliana; PERKINS, SUSANNE

Subject: August Monthly Reports

Attachments: CA Permit Summary Report (PSTS).xls; R9 - WTR5 Monthly Permit Status Summary

Report.xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker

(Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued

Permits Tracker.xls; PI EPA Issued Permits Tracker.xls; Tribal EPA Issued Permits

Tracker.xls; List of Monthly ICIS-NPDES Rpts.xlsx

Attached are the latest Permit monthly reports for Aug. 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ data has <u>NOT</u> been updated since they migrated over to ICIS last year in Dec. If you have any questions, please contact me.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

Sent: Wednesday, July 03, 2013 7:16 AM

To: Bose, Laura (Separated); Greenberg, Ken; Kozelka, Peter; Marincola, JamesPaul; Mues,

Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn; Tran, Linh; Wampler,

David; Whitson, Amelia; Woo, Abraham Hanf, Lisa; Liu, Chun; Christophe, Liliana

Subject: July - Water Monthly Permit Reports

Attachments: List of Monthly ICIS-NPDES & PCS Rpts.xlsx; R9 - WTR5 Monthly Permit Status Summary

Report.xls; CA Permit Summary Report (PSTS).xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued Permits Tracker.xls; PI EPA Issued Permits

Tracker.xls; Tribal EPA Issued Permits Tracker.xls

Attached are the latest Permit monthly reports for July 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ data has NOT been updated since they migrated over to ICIS.

Sandra Chew
US EPA Region 9 - Enf-4-1
75 Hawthorne Street
San Francisco, CA 94105

Phone: 415-972-3335

Cc:

From: Higuchi, Dean

Sent: Monday, June 03, 2013 3:51 PM To: Albright, David: Anderson, Julie:

Albright, David; Anderson, Julie; Appleton, Zac; Ardito, Michael (Separated); Armann, Steve; Barton, Dana; Blumenfeld, Jared; Bose, Laura (Separated); Bromley, Eugene; Calanog, Steve; Caplan, Robert W.; Chow, Eugenia; Demorest, Allen; Drake, Kerry; Eberhardt, Doug; Filart, Cheryl; Fondahl, Lauren; Ford, Roy; Gomes, Janis (Separated); Greenberg, Ken; Grisier, Mary; Guerra, Gary; Gullatt, Kristin; Hanf, Lisa; Hashimoto, Janet; Hiatt, Gerald; Higuchi, Dean; Hood, Timonie; Jones, Joel E.; Kahakui, Kahi; Kemmerer, John; Lawrence, Kathryn; Leon-Guerrero, Ephraim; Li, Corine; Licata, Juanita; Lincoff, Andy; Macler, Bruce; Manzanilla, Enrique; Miller, Amy; Moore, Kathi; Ota, Allan; Polanco, Susan; Pollins, Mark; Pringle, Everett; Priselac, Adrienne; Rao, Kate; Robberson, Bill; Rogow, Michelle; Roser, Sara; Ross, Brian; Schmidt, David; Scott, Jeff; Schultz, Frances; Sheehan, Eileen; Smith, DavidW; Strauss, Alexis; Stuber, Robyn; Ueno, Karen; Vendlinski, Tim; Wiltse, Wendy; Woo, Nancy; Young, Marvin (Separated); Johnson, Kathleen; Maier, Brent; Gentile, Laura; Arcaute, Francisco; PerezSullivan, Margot; Sylls, Gene; Yoqi, David; McCarroll, John; Wolfram, Michael; Lee, Michael; Scott, Norwood; Goldstein, Carl; Fernandez, Daniel; Lopez, Mariela; Richman, Lance; Jackson, Julia; VonVacano, Marcela; MURRAY, SHARON; Katzin, Marcy; Mechem, Russell; Mann, Michael; KUO, LYNN; Shaffer, Caleb; Mowrey, Marc; McDaniel, Doug; Vitulano, Karen; Ueno, Karen; Lichens, Christopher; Mues, Pascal; Villanueva, Morena; Byous, Eric; Kermish, Laurie; Magnuson, Janet; Sablad, Elizabeth; Arora, Pankaj; frankrabauliman@deg.gov.mp; reinacamacho@deg.gov.mp; Busterud, Gretchen; Chesnutt,

frankrabauliman@deq.gov.mp; reinacamacho@deq.gov.mp; Busterud, Gretchen; Chesnutt, John; Merer, Joe; Mogharabi, Nahal; 'tjonick@sga-inc.net'; Kabei, Arlene (Separated); Tyahla, Stephen; Amato, Paul; Slay, Hudson; LEVIN, NANCY; Glenn, William; Schechter, Debbie (Separated); Moffatt, Brett; Keener, Bill; ZIFF, SARA; Richmond, Dawn; COHEN, Deborra;

Zito, Kelly; Jones, Lucrina; Brush, Jason; Cook, Anna-Marie; Konner, Thomas; PERKINS, SUSANNE; Callado, Jinky; Konner, Thomas; PERKINS, SUSANNE; Fleming, Megan;

bfpollock@yahoo.com; Rodriguez, Roberto

Subject: Hawaii News Clips: 6/3/13

FACT CHECK — Caldwell: City Ahead of Schedule in Fixing Sewer System

By Sophie Cocke 06/03/2013 Honolulu Civil Beat

Mayor <u>Kirk Caldwell</u> says the city is making good progress on a federal agreement requiring a major overhaul to Oahu's sewer system.

The repairs are part of a 2010 settlement between the U.S. Environmental Protection Agency and city.

At a press conference last week, Caldwell said:

Our sewer projects, we're ahead of schedule on our consent decree.

The city is required to complete numerous improvements to its sewer system by 2035, including installing secondary treatment facilities at Sand Island and Honouliuli.

We asked the mayor's office what Caldwell meant by "ahead of schedule."

And mayoral spokesman Jesse Broder Van Dyke replied via email:

The Global Consent Decree (GCD) was issued December 17, 2010. From that point to present, the city has been 100% compliant with all requirements; meaning if GCD states an action on a particular date, the City has met it on or in most cases ahead of schedule.

Dean Higuchi, a spokesman for the EPA, tells us the city is in compliance with the requirements in the consent decree. However, he said he could not vouch for whether the city is ahead of schedule, noting that would take a lot of digging through documents.

However, Van Dyke provided a detailed list of all the requirements that the city has to fulfill in the coming years, along with the deadlines.

The documents show that the city has met all of the requirements to date and that in many areas is finishing tasks ahead of the deadlines. For instance, video surveillance of 300 miles of pipes was required by the end of 2013, but 579 miles of pipe has been inspected. The city is also ahead of deadlines on cleaning gravity mains and conducting smoke tests, and has completed dozens of sewer rehabilitation projects several years ahead of schedule.

The consent decree has been in place since 2010 when Peter Carlisle was mayor. Caldwell took over the mayor's job in January.

Caldwell told us that the consent decree is one of the top five priorities of his administration.

"I want to get it done quicker, faster, get ahead of deadlines, so that we not only honor the consent decree, but we then meet it ahead of time," he said.

Caldwell added that it's a particularly good time to focus on the sewer work because interest rates on bonds, which pay for the work, are very low right now.

"Why not be ahead of the deadlines for once?" he said.

BOTTOM LINE: We find Caldwell's statement to be **TRUE**. The city has not only met dozens of requirements outlined in the consent decree, but in many cases has completed requirements several years ahead of schedule.

Representative takes underwater tour of Kauai's diseased coral reef

Posted: Sunday, June 2, 2013 1:00 am

Chris D'Angelo - The Garden Island

HANALEI — As part of a busy Aloha Friday schedule on Kauai, U.S. Rep. Tulsi Gabbard went in the water to see Kauai's diseased coral reefs for herself.

"It was troubling to see what once was beautiful, vibrant coral reef decaying and withering away," the Congresswoman said.

After initially being contacted by Hanalei resident Mike Sheehan, Gabbard accepted an invitation to tour the area and learn about the disease outbreak.

"It was important for me to be there," she said, "to be able to gain a better understanding."

It was a move that went over well with the scientists and biologists involved in the ongoing study.

"We were so pleased to have a member of the congressional delegation come out," said Dr. Greta Aeby, a coral expert with the Hawaii Institute of Marine Biology at the University of Hawaii. "To see people that are in a position to help protect our natural resources is very important."

Gabbard's guides for the day included Aeby, Hanalei biologist Terry Lilley and Dr. Thierry Work, a wildlife disease specialist for the U.S. Geological Survey's National Wildlife Health Center in Honolulu.

The boat trip — captained by Sheehan — began with a short jaunt up the Hanalei River to look at the digging in the wetland, which Lilley says is causing a large amount of mud and sediment to be dumped out onto the reef.

From there, Gabbard, her chief of staff Amy Asselbaye and Kauai field representative Kaulana Finn were taken across the bay to look at diseased coral colonies on Waipa Reef.

Gabbard did little talking, but her eyes and ears were wide open.

"We explained to (Gabbard) how the land-use patterns are affecting the coral reefs," Work said after the tour.

Gabbard said it was obvious the reef at Waipa is in bad shape.

"It's apparent to anyone to see the lack of fish in the area, to see the actual decay and the browning and withering away of the beautiful coral," she said.

Gabbard described her experience Friday as "eye-opening" and said there is no question action must be taken."

"I'm going to do whatever I can to help," she said, adding that she and her staff will continue doing their own research and working with the experts in the field.

Aeby, who led Gabbard's underwater tour, described Friday's visit as a "rare event."

"Not only did Tulsi show the interest, make time to come out here and listen to the problem, but she actually got in the water and was looking at this problem first-hand," she said. "This is critically important and we're hoping from actions such as this that indeed people will start to take notice."

Lilley, who first alerted scientists to the outbreak more than a year ago, said he was excited to finally start getting "the right people" in the water.

"We've got 100,000 dead corals out there, dying right now," he said. "And there's more people tonight caring about them than there were yesterday."

The epidemic — which Work and Aeby have now confirmed at several North Shore locations — is caused by a variety of bacteria working together to rapidly eat away coral tissues.

Gabbard described Hanalei as "a beautiful piece of Hawaii."

"To go below the surface to see this destruction happening before our very eyes is very, very troubling and concerns me deeply."

Gabbard said it is time to start looking at the bigger picture and the affect people are having on the ocean ecosystem in Hawaii.

"Awareness is usually the biggest way to be able to create the pressure to affect change and cause action," she said.

Gabbard's day-long visit to Kauai also included speaking at the Kauai Drug Court graduation ceremony and attending Kauai Community College's screening of "The Invisible War," an investigative documentary about rape in the military.

Following the screening, the Congresswoman participated in a panel discussion about the issue.

Gabbard is a captain in the Hawaii Army National Guard and one of the first female combat veterans to serve in Congress. Earlier this month, she introduced the Military Justice Improvement Act — HR 2016 — which would reform the military justice system by taking away command influence in the prosecution of crimes with a punishment of one year or more in confinement.

Chew, Sandra From:

Monday, June 03, 2013 1:28 PM Sent:

To: Bose, Laura (Separated); Bromley, Eugene; Greenberg, Ken; Kozelka, Peter; Marincola,

JamesPaul; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW; Stuber, Robyn;

Tinger, John; Tran, Linh; Whitson, Amelia; Woo, Abraham

Hanf, Lisa; Liu, Chun; Christophe, Liliana Cc:

Subject: June Monthly Reports

List of Monthly ICIS-NPDES & PCS Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 -Attachments:

WTR5 Monthly Permit Status Summary Report xls; AZ State Issued Permit Inventory xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued Permits Tracker.xls; PI EPA Issued Permits

Tracker.xls; Tribal EPA Issued Permits Tracker x3A 4007985.xls

Attached are the latest Permit monthly reports for June 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ data has NOT been updated since they migrated over to ICIS.

Sandra Chew US EPA Region 9 - Enf-4-1 **75 Hawthorne Street** San Francisco, CA 94105 Phone: 415-972-3335

From: Elizabeth Sablad Sablad.elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:45 PM

To: Sablad, Elizabeth

Subject: Fw: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Attachments: DOC065.PDF; DOC066.PDF; DOC067.PDF; Estimated Schedule General Permit.pdf;

20120509 Draft FY2013 Permit Issuance Schedule.docx

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

---- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:45 PM -----

From: "Lum, Darryl C" <a href=

To: Elizabeth Sablad/R9/USEPA/US@EPA,

Cc: "Wong, Alec Y" <alec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA, "Honda, Myron" ">My

Date: 05/09/2012 07:18 PM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Elizabeth,

Friday at 10 am HST/1 pm PST sounds good.

- 1. Reference for authorization to administratively extend the General Permits **Please see the attached pdf file (DOC065.PDF)**.
- 2. Rule change process milestone schedule for General Permit reissuance package The attached pdf file (DOC066.PDF) is the HAR rule making procedures. DOC067.PDF is a draft summary we were provided in the HAR rule making class. Estimated Schedule General Permit.pdf is the estimated milestone schedule to readopt the general permits.
- 3. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support 20120509 Draft FY2013 Permit Issuance Schedule.docx is the revised permit issuance list. The permits in yellow highlights are the proposed contractor support permits. You will notice that we have the Island Dairy facility highlighted. We have not received an NPDES application yet for this facility. Will this present a problem as you are preparing the contract?
- 4. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13 –

We would like to consider proposed rule change Nos. 1, 2, 3, 5.b, and 5.c. For the implementation document revisions we do not have the in-house resources to do No. 1. What type of assistance can be offered to us? For No. 2, does the EPA have a ZOM form we could use as a template? We are currently working on Nos. 3 and 4.

Thanks,

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, May 08, 2012 11:56 AM

To: Lum, Darryl C; Wong, Alec Y; DavidW Smith

Subject: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi All.

Can we meet at 10am HST/ 1pm PST for our second pre-meeting call on Friday (5/11)?

Thanks for meeting with us today. I think the call was very helpful in preparing us for next week.

For our Friday call, DOH will provide:

- 5. Reference for authorization to administratively extend the General Permits
- 6. Rule change process milestone schedule for General Permit reissuance package
- 7. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support.
- 8. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13

5.

I'll look into providing Myron the updated dilution model references, whether Hawaii will need to use their fish consumption rate for the isomers discussed in #7 of the suggested rule changes, whether an authorization to use the recalculation procedure is necessary, and any guidance we can provide for addressing antidegradation in General Permits.

Please let me know if you cannot make the meeting on Friday.

Sincerely,

Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044

<u>sablad.elizabeth@epa.gov</u>(See attached file: DOC067.PDF)(See attached file: DOC066.PDF)(See attached file: DOC065.PDF)(See attached file: Estimated Schedule General Permit.pdf)(See attached file: 20120509 Draft FY2013 Permit Issuance Schedule.docx)

From: Elizabeth Sablad Sablad.elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:45 PM

To: Sablad, Elizabeth

Subject: Fw: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

---- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:44 PM -----

From: Elizabeth Sablad/R9/USEPA/US

To: "Lum, Darryl C" <darryl.lum@doh.hawaii.gov>

Cc: alec.wong@doh.hawaii.gov, DavidW Smith/R9/USEPA/US@EPA

Date: 05/10/2012 09:04 AM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Darryl,

Thanks for providing all of this to us in advance. I had to read the authorization to administratively extend the NGPCs about 5 times, but that looks like good news!

I have a couple of comments on the FY13 schedule. Based on our call the other day, I had estimated that only 6 of the 10 majors proposed in FY12 would be finalized, which would mean that 4 should be carried over to the FY13 schedule. I only see Honouliuli carried over. In addition, based on our conversation, the DOT MS4 should be carried over. I also suggest that you include consideration of the resources necessary to finalize the General Permits, since they will be part of the FY13 workload. Both the FY12 and FY13 schedules include 14 individual permits; however, the FY12 schedule will most likely not be met. Considering all of this, I suggest taking a hard look at what your staff can realistically accomplish in FY13 and revising the schedule as needed.

As far as the General Permits milestone schedule, I'm a little confused as to why only certain dates are included. Are some of these already scheduled? Also, based on the experience with the PGP, I suggest extending the timeframe for Governor approval of public notice for the General Permits package to be longer than one week, as it took a month and a half between submittal to the Governor and public notice of the PGP.

There should be no problem to transfer contract support from Island Dairy to another permit, if needed. I plan to obtain enough support for 5 permits, though, so let me know ASAP, if that will not be the case.

I'm happy to hear you want to pursue a few of the rule changes we proposed. We can talk more about the details later.

We would really appreciate it if you could take another look at the FY13 schedule and General Permits milestone schedule and make any revisions before tomorrow's call.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov "Lum, Darryl C" ---05/09/2012 07:18:30 PM---Hi Elizabeth,

From: "Lum, Darryl C"

To: Elizabeth Sablad/R9/USEPA/US@EPA

Cc: "Wong, Alec Y" <a lec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA, "Honda, Myron" Myron.Honda@doh.hawaii.gov>

Date: 05/09/2012 07:18 PM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Elizabeth,

Friday at 10 am HST/1 pm PST sounds good.

- 1. Reference for authorization to administratively extend the General Permits **Please see the attached pdf file (DOC065.PDF)**.
- 2. Rule change process milestone schedule for General Permit reissuance package The attached pdf file (DOC066.PDF) is the HAR rule making procedures. DOC067.PDF is a draft summary we were provided in the HAR rule making class. Estimated Schedule General Permit.pdf is the estimated milestone schedule to readopt the general permits.
- 3. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support 20120509 Draft FY2013 Permit Issuance Schedule.docx is the revised permit issuance list. The permits in yellow highlights are the proposed contractor support permits. You will notice that we have the Island Dairy facility highlighted. We have not received an NPDES application yet for this facility. Will this present a problem as you are preparing the contract?
- 4. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13 –

We would like to consider proposed rule change Nos. 1, 2, 3, 5.b, and 5.c. For the implementation document revisions we do not have the in-house resources to do No. 1. What type of assistance can be offered to us? For No. 2, does the EPA have a ZOM form we could use as a template? We are currently working on Nos. 3 and 4.

Thanks,

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, May 08, 2012 11:56 AM

To: Lum, Darryl C; Wong, Alec Y; DavidW Smith

Subject: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi All,

Can we meet at 10am HST/ 1pm PST for our second pre-meeting call on Friday (5/11)?

Thanks for meeting with us today. I think the call was very helpful in preparing us for next week.

For our Friday call, DOH will provide:

- 5. Reference for authorization to administratively extend the General Permits
- 6. Rule change process milestone schedule for General Permit reissuance package
- 7. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support.
- 8. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13

5.

I'll look into providing Myron the updated dilution model references, whether Hawaii will need to use their fish consumption rate for the isomers discussed in #7 of the suggested rule changes, whether an authorization to use the recalculation procedure is necessary, and any guidance we can provide for addressing antidegradation in General Permits.

Please let me know if you cannot make the meeting on Friday.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044

sablad.elizabeth@epa.gov[attachment "DOC067.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC066.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC065.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "Estimated Schedule General Permit.pdf" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "20120509 Draft FY2013 Permit Issuance Schedule.docx" deleted by Elizabeth Sablad/R9/USEPA/US]

From: Elizabeth Sablad Sablad.Elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:44 PM

To: Sablad, Elizabeth

Subject: Fw: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Attachments: 20120510a Draft FY2013 Permit Issuance Schedule.docx; 20120510 Estimated Schedule

General Permit.pdf

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

---- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:44 PM -----

From: "Lum, Darryl C" darryl.lum@doh.hawaii.gov
To: Elizabeth Sablad/R9/USEPA/US@EPA,

Cc: "Wong, Alec Y" <alec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA

Date: 05/10/2012 07:53 PM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Elizabeth,

Please see attached for the revised FY13 schedule.

Also attached is the revised general permit milestone schedule. The steps without dates are things we must do between the estimated dates. For example, between 7/15/12 and 7/31/12 we must create a hearing report, create a post hearing small business impact statement, provide individual responses to hearing commenters, etc.

Thanks, Darryl

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Thursday, May 10, 2012 6:08 AM

To: Lum, Darryl C

Cc: Wong, Alec Y; DavidW Smith

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Darryl,

Thanks for providing all of this to us in advance. I had to read the authorization to administratively extend the NGPCs

about 5 times, but that looks like good news!

I have a couple of comments on the FY13 schedule. Based on our call the other day, I had estimated that only 6 of the 10 majors proposed in FY12 would be finalized, which would mean that 4 should be carried over to the FY13 schedule. I only see Honouliuli carried over. In addition, based on our conversation, the DOT MS4 should be carried over. I also suggest that you include consideration of the resources necessary to finalize the General Permits, since they will be part of the FY13 workload. Both the FY12 and FY13 schedules include 14 individual permits; however, the FY12 schedule will most likely not be met. Considering all of this, I suggest taking a hard look at what your staff can realistically accomplish in FY13 and revising the schedule as needed.

As far as the General Permits milestone schedule, I'm a little confused as to why only certain dates are included. Are some of these already scheduled? Also, based on the experience with the PGP, I suggest extending the timeframe for Governor approval of public notice for the General Permits package to be longer than one week, as it took a month and a half between submittal to the Governor and public notice of the PGP.

There should be no problem to transfer contract support from Island Dairy to another permit, if needed. I plan to obtain enough support for 5 permits, though, so let me know ASAP, if that will not be the case.

I'm happy to hear you want to pursue a few of the rule changes we proposed. We can talk more about the details later.

We would really appreciate it if you could take another look at the FY13 schedule and General Permits milestone schedule and make any revisions before tomorrow's call.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

From: "Lum, Darryl C" < darryl.lum@doh.hawaii.gov>

To: Elizabeth Sablad/R9/USEPA/US@EPA

Cc: "Wong, Alec Y" <alec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA, "Honda, Myron" <Myron.Honda@doh.hawaii.gov>

Date: 05/09/2012 07:18 PM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Elizabeth,

Friday at 10 am HST/1 pm PST sounds good.

- 1. Reference for authorization to administratively extend the General Permits **Please see the attached pdf file (DOC065.PDF).**
- 2. Rule change process milestone schedule for General Permit reissuance package The attached pdf file (DOC066.PDF) is the HAR rule making procedures. DOC067.PDF is a draft summary we were provided in the HAR rule making class. Estimated Schedule General Permit.pdf is the estimated milestone schedule to readopt the general permits.

- 3. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support 20120509 Draft FY2013 Permit Issuance
 Schedule.docx is the revised permit issuance list. The permits in yellow highlights are the proposed contractor support permits. You will notice that we have the Island Dairy facility highlighted. We have not received an NPDES application yet for this facility. Will this present a problem as you are preparing the contract?
- 4. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13 –

We would like to consider proposed rule change Nos. 1, 2, 3, 5.b, and 5.c.

For the implementation document revisions we do not have the in-house resources to do No.

1. What type of assistance can be offered to us? For No. 2, does the EPA have a ZOM form we could use as a template? We are currently working on Nos. 3 and 4.

Thanks,

Darryl Lum

Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, May 08, 2012 11:56 AM

To: Lum, Darryl C; Wong, Alec Y; DavidW Smith

Subject: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi All.

Can we meet at 10am HST/ 1pm PST for our second pre-meeting call on Friday (5/11)?

Thanks for meeting with us today. I think the call was very helpful in preparing us for next week.

For our Friday call, DOH will provide:

- Reference for authorization to administratively extend the General Permits
- 6. Rule change process milestone schedule for General Permit reissuance package
- 7. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support.
- 8. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13

5.

I'll look into providing Myron the updated dilution model references, whether Hawaii will need to use their fish consumption rate for the isomers discussed in #7 of the suggested rule changes, whether an authorization to use the recalculation procedure is necessary, and any guidance we can provide for addressing antidegradation in General Permits.

Please let me know if you cannot make the meeting on Friday.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco. CA 94105

Office (415) 972-3044

sablad.elizabeth@epa.gov[attachment "DOC067.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC066.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC065.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "Estimated Schedule General Permit.pdf" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "20120509 Draft FY2013 Permit Issuance Schedule.docx" deleted by Elizabeth Sablad/R9/USEPA/US] (See attached file: 20120510a Draft FY2013 Permit Issuance Schedule.docx) (See attached file: 20120510 Estimated Schedule General Permit.pdf)

Elizabeth Sablad <Sablad. Elizabeth@epamail.epa.gov> From:

Tuesday, May 21, 2013 2:44 PM Sent:

Sablad, Elizabeth To:

Fw: Propose Friday (5/11) meeting at 10am HST/1pm PST? Subject: 20120510a Draft FY2013 Permit Issuance Schedule.pdf Attachments:

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

---- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:43 PM -----

From: "Lum, Darryl C" <a href=

Cc: <alec.wong@doh.hawaii.gov> Date: 05/14/2012 11:42 AM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi David and Elizabeth,

Please see attached for the revised schedule. I added Pearl Harbor (HI 0110230).

Thanks,

Darryl Lum Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

"Lum, Darryl C" < darryl.lum@doh.hawaii.gov > From:

Elizabeth Sablad/R9/USEPA/US@EPA To:

"Wong, Alec Y" <alec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA Cc:

05/10/2012 07:53 PM Date:

RE: Propose Friday (5/11) meeting at 10am HST/1pm PST? Subject:

Hi Elizabeth,

Please see attached for the revised FY13 schedule.

Also attached is the revised general permit milestone schedule. The steps without dates are things we must do between the estimated dates. For example, between 7/15/12 and 7/31/12 we must create a hearing report, create a post hearing small business impact statement, provide individual responses to hearing commenters, etc.

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Thursday, May 10, 2012 6:08 AM

To: Lum, Darryl C

Cc: Wong, Alec Y; DavidW Smith

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Darryl,

Thanks for providing all of this to us in advance. I had to read the authorization to administratively extend the NGPCs about 5 times, but that looks like good news!

I have a couple of comments on the FY13 schedule. Based on our call the other day, I had estimated that only 6 of the 10 majors proposed in FY12 would be finalized, which would mean that 4 should be carried over to the FY13 schedule. I only see Honouliuli carried over. In addition, based on our conversation, the DOT MS4 should be carried over. I also suggest that you include consideration of the resources necessary to finalize the General Permits, since they will be part of the FY13 workload. Both the FY12 and FY13 schedules include 14 individual permits; however, the FY12 schedule will most likely not be met. Considering all of this, I suggest taking a hard look at what your staff can realistically accomplish in FY13 and revising the schedule as needed.

As far as the General Permits milestone schedule, I'm a little confused as to why only certain dates are included. Are some of these already scheduled? Also, based on the experience with the PGP, I suggest extending the timeframe for Governor approval of public notice for the General Permits package to be longer than one week, as it took a month and a half between submittal to the Governor and public notice of the PGP.

There should be no problem to transfer contract support from Island Dairy to another permit, if needed. I plan to obtain enough support for 5 permits, though, so let me know ASAP, if that will not be the case.

I'm happy to hear you want to pursue a few of the rule changes we proposed. We can talk more about the details later.

We would really appreciate it if you could take another look at the FY13 schedule and General Permits milestone schedule and make any revisions before tomorrow's call.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105

Office (415) 972-3044 sablad.elizabeth@epa.gov

From: "Lum, Darryl C" < darryl.lum@doh.hawaii.gov>

To: Elizabeth Sablad/R9/USEPA/US@EPA

Cc: "Wong, Alec Y" <alec.wong@doh.hawaii.gov>, DavidW Smith/R9/USEPA/US@EPA, "Honda, Myron" <<u>Myron.Honda@doh.hawaii.gov</u>>

Date: 05/09/2012 07:18 PM

Subject: RE: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi Elizabeth,

Friday at 10 am HST/1 pm PST sounds good.

- 1. Reference for authorization to administratively extend the General Permits **Please see the attached pdf file (DOC065.PDF).**
- 2. Rule change process milestone schedule for General Permit reissuance package The attached pdf file (DOC066.PDF) is the HAR rule making procedures. DOC067.PDF is a draft summary we were provided in the HAR rule making class. Estimated Schedule General Permit.pdf is the estimated milestone schedule to readopt the general permits.
- 3. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support 20120509 Draft FY2013 Permit Issuance Schedule.docx is the revised permit issuance list. The permits in yellow highlights are the proposed contractor support permits. You will notice that we have the Island Dairy facility highlighted. We have not received an NPDES application yet for this facility. Will this present a problem as you are preparing the contract?
- 4. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13 –

We would like to consider proposed rule change Nos. 1, 2, 3, 5.b, and 5.c.

For the implementation document revisions we do not have the in-house resources to do No.

1. What type of assistance can be offered to us? For No. 2, does the EPA have a ZOM form we could use as a template? We are currently working on Nos. 3 and 4.

Thanks,

Darryl Lum

Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, May 08, 2012 11:56 AM

To: Lum, Darryl C; Wong, Alec Y; DavidW Smith

Subject: Propose Friday (5/11) meeting at 10am HST/1pm PST?

Hi All.

Can we meet at 10am HST/ 1pm PST for our second pre-meeting call on Friday (5/11)?

Thanks for meeting with us today. I think the call was very helpful in preparing us for next week.

For our Friday call, DOH will provide:

- 5. Reference for authorization to administratively extend the General Permits
- 6. Rule change process milestone schedule for General Permit reissuance package
- 7. Revised FY13 permit issuance list, considering any permits expected to carry over from FY12, and identifying permits for contract support.
- 8. Suggested rule changes/implementation document revisions that DOH would like to pursue in FY13

5.

I'll look into providing Myron the updated dilution model references, whether Hawaii will need to use their fish consumption rate for the isomers discussed in #7 of the suggested rule changes, whether an authorization to use the recalculation procedure is necessary, and any guidance we can provide for addressing antidegradation in General Permits.

Please let me know if you cannot make the meeting on Friday.

Sincerely, Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044

sablad.elizabeth@epa.gov[attachment "DOC067.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC066.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "DOC065.PDF" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "Estimated Schedule General Permit.pdf" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "20120509 Draft FY2013 Permit Issuance Schedule.docx" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "20120510a Draft FY2013 Permit Issuance Schedule.docx" deleted by Elizabeth Sablad/R9/USEPA/US] [attachment "20120510 Estimated Schedule General Permit.pdf" deleted by Elizabeth Sablad/R9/USEPA/US] (See attached file: 20120510a Draft FY2013 Permit Issuance Schedule.pdf)

From: Elizabeth Sablad Sablad.elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:41 PM

To: Sablad, Elizabeth

Subject: Fw: List of permits for contract support FY13

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

----- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:40 PM -----

From: "Lum, Darryl C" dot-hawaii.gov
To: Elizabeth Sablad/R9/USEPA/US@EPA,
Cc: Peter Kozelka/R9/USEPA/US@EPA

Date: 08/14/2012 10:13 AM

Subject: RE: List of permits for contract support FY13

Hi Elizabeth,

We are set on these permits.

Thanks, Darryl

Darryl Lum Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Elizabeth Sablad [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, August 14, 2012 5:14 AM

To: Lum, Darryl C **Cc:** Peter Kozelka

Subject: List of permits for contract support FY13

Hi Darryl,

Can you send me the list of permits you want contract support for FY13? Originally, I had the following permits, but not sure if you are set on those. Please let me know so I can provide the list to PG. Thanks!

- 1. Honouliuli WWTP
- 2. Kailua Regional WWTP
- 3. Wailua WWTP
- 4. Marine Corps Base Kaneohe Bay WRF
- 5. Island Dairy

-Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov From: Elizabeth Sablad Sablad.elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:36 PM

To: Sablad, Elizabeth

Subject: Fw: November Monthly Call - reschedule?

Attachments: 20121030.Workplan Permit Issuance Schedule.pdf

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

---- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:36 PM -----

From: "Lum, Darryl C" <a href="mailto:sd

Date: 10/30/2012 05:46 PM

Subject: RE: November Monthly Call - reschedule?

Hi Elizabeth,

Wednesday 11/7 at 11 am HST sounds good.

Please see attached for an update to the FY 2012 permit issuance schedule.

Thanks, Darryl

Darryl Lum

Clean Water Branch State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad.Elizabeth@epamail.epa.gov [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Tuesday, October 30, 2012 12:07 PM

To: Lum, Darryl C

Subject: November Monthly Call - reschedule?

Hi Darryl,

Can we move our regular monthly call to either Wednesday, the 7th or Thursday, the 8th at 11am HST? It looks like we didn't do one for October. At least I don't see anything on my calendar. Sorry about that. My head has been on Central Valley issues lately.

-Elizabeth

Elizabeth Sablad

US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044

sablad.elizabeth@epa.gov(See attached file: 20121030.Workplan Permit Issuance Schedule.pdf)

From: Elizabeth Sablad Sablad.elizabeth@epamail.epa.gov

Sent: Tuesday, May 21, 2013 2:30 PM

To: Sablad, Elizabeth

Subject: Fw: Agenda for HI EOY NPDES Session

Attachments: Dec-2012 Agenda for NPDES Permits Session.doc

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

----- Forwarded by Elizabeth Sablad/R9/USEPA/US on 05/21/2013 02:30 PM -----

From: Elizabeth Sablad/R9/USEPA/US

To: "Lum, Darryl C" ,

Date: 11/29/2012 10:42 AM

Subject: RE: Agenda for HI EOY NPDES Session

Hi Darryl,

- 1. The % current in the table is based on what was current at the end of FY12, which was up through September 30th. It looks like you may be counting Kahe, which was issued after that date. The intent of that table was to show the year's accomplishments (FY12) based on the grant commitments.
- 2. An update on the non-SW and SW minors would be good.
- 3. I replaced Island Dairy with the PHNSY Chlorinator units (attached).

Let me know if you have further questions. We can go over all of this on Monday if you like, too.

-Elizabeth

(See attached file: Dec-2012 Agenda for NPDES Permits Session.doc)

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044 sablad.elizabeth@epa.gov

"Lum, Darryl C" ---11/29/2012 09:10:41 AM---Hi Elizabeth,

From: "Lum, Darryl C" dor. Elizabeth Sablad/R9/USEPA/US@EPA,

Date: 11/29/2012 09:10 AM

Subject: RE: Agenda for HI EOY NPDES Session

Hi Elizabeth,

I have 3 comments:

- 1. Page 2 We believe there are 9 out of 18 majors that are current. Please see attached. Scott got the data from ICIS.
- 2. Page 2, Footnotes b and c Scott and I are checking the non -SW minors and SW minors in ICIS. I think there may be some permits that expired and no renewal applications were submitted. I have to verify this. I'll let you know if we find anything, and if we will update ICIS.
- 3. Page 3 We replaced Island Dairy with PHNSY & IMF Dockside Chlorinator Units and Chlorinator/Dechlorinator Units (HI 1120801).

Thanks, Darryl

Darryl Lum Clean Water Branch

State of Hawaii Department of Health

Phone: (808) 586-4309 Fax: (808) 586-4352

Notice: This information and attachments are intended only for the use of the individual(s) or entity to which it is addressed, and may contain information that is privileged and/or confidential. If the reader of this message is not the intended recipient, any dissemination, distribution, or copying of this communication is strictly prohibited and may be punishable under state and federal law. If you have received this communication and/or attachments in error, please notify the sender via e-mail immediately and destroy all electronic and paper copies.

From: Sablad.Elizabeth@epamail.epa.gov [mailto:Sablad.Elizabeth@epamail.epa.gov]

Sent: Wednesday, November 28, 2012 7:59 AM

To: Lum, Darryl C; Wong, Alec Y; Woo.Nancy@epamail.epa.gov; Smith.DavidW@epamail.epa.gov

Cc: Yin.Christina@epamail.epa.gov; Slay.Hudson@epamail.epa.gov

Subject: Agenda for HI EOY NPDES Session

Hi All,

Attached is the agenda we are proposing for the NPDES Session on Thursday, December 6th at 9:45 AM HST (11:45 AM PST). Please let me know if you have any questions or would like to add anything to the agenda.

Sincerely,

Elizabeth

Elizabeth Sablad US EPA, Region IX (WTR-5) 75 Hawthorne St San Francisco, CA 94105 Office (415) 972-3044

sablad.elizabeth@epa.gov[attachment "Individual Majors.xlsx" deleted by Elizabeth Sablad/R9/USEPA/US]

Sent: Friday, May 03, 2013 2:44 PM

To: Sablad, Elizabeth Subject: HI Monthly Report

Attachments: HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls

Hi Elizabeth,

That is strange. I checked my "Sent Item" and the message included the HI reports. I am sending them directly to you this time. Hope you get them.

Sandra Chew

US EPA Region 9 - Enf-4-1 75 Hawthorne Street San Francisco, CA 94105 Phone: 415-972-3335

Sent: Thursday, May 02, 2013 12:41 PM

To: Bose, Laura (Separated); Bromley, Eugene; Greenberg, Ken; Wampler, David; Kozelka,

Peter; Marincola, JamesPaul; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tinger, John; Tran, Linh; Whitson, Amelia; Woo, Abraham

Cc: Hanf, Lisa; Liu, Chun; Christophe, Liliana

Subject: May - Water Monthly Report

Attachments: List of Monthly ICIS-NPDES & PCS Rpts.xlsx; CA Permit Summary Report (PSTS).xls; R9 -

WTR5 Monthly Permit Status Summary Report.xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months x3A 3946170.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permit Inventory.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits Tracker.xls; PI EPA Issued

Permits Tracker.xls; Tribal EPA Issued Permits Tracker.xls

Attached are the latest Permit monthly reports for May 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ reports are not current. AZ has not supplied current data to EPA since they migrated over to ICIS in Dec. 2012 AZ is working on some programming issues in order to batch their data over to ICIS-NPDES. We are hoping that they will start flowing data into ICIS beginning July 2013.

Sandra Chew

US EPA Region 9 - Enf-4-1 75 Hawthorne Street San Francisco, CA 94105 Phone: 415-972-3335

Sent: Wednesday, April 03, 2013 10:27 AM

To: Bose, Laura (Separated); Bromley, Eugene; Greenberg, Ken; Wampler, David; Kozelka,

Peter; Marincola, JamesPaul; Mues, Pascal; Sablad, Elizabeth; Sheth, Gary; Smith, DavidW;

Stuber, Robyn; Tinger, John; Tran, Linh; Whitson, Amelia; Woo, Abraham

Cc: Hanf, Lisa; Liu, Chun; Christophe, Liliana

Subject: April Monthly Reports

Attachments: List of Monthly ICIS-NPDES & PCS Rpts.xlsx; R9 - WTR5 Monthly Permit Status Summary

Report.xls; CA Permit Summary Report (PSTS).xls; AZ State Issued Permit Inventory.xls; AZ State Issued Permits Tracker.xls; CALIF Individual, MS4, and General Permits.xls; EPA Issued Permits Crosstab, plus Tribal & Non-Tribal.xls; EPA Issued Permits Expiring in 9 Months.xls; EPA Issued Permits Tracker (Includeds 301(h) and Jointly issued permits) All.xls; HI State Issued Permits Tracker.xls; NV State Issued Permits - Non-Tribal.xls; NV State Issued Permits Tracker.xls; PI EPA Issued Permits

Tracker.xls; Tribal EPA Issued Permits Tracker.xls

Attached are the latest Permit monthly reports for April 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.

Please note that AZ reports are not current. AZ has not supplied current data to EPA since they migrated over to ICIS in Dec. 2012 AZ is working on some programming issues in order to batch their data over to ICIS-NPDES. We are hoping that they will start flowing data into ICIS beginning August 2013.

Sandra Chew

US EPA Region 9 - Enf-4-1 75 Hawthorne Street San Francisco, CA 94105 Phone: 415-972-3335 From: Sablad, Elizabeth

Sent: Tuesday, March 05, 2013 12:16 PM

To: Dan Connally

Subject: Hawaii Permit Issuance Schedule

Attachments: 20130103 FY2013 Permit Issuance Schedule.doc

Hi Dan,

FYI – Attached is the schedule Hawaii agreed to. I think I forgot to send it to you last week.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov From: Sablad, Elizabeth

Sent: Thursday, February 28, 2013 1:13 PM

To: Slay, Hudson

Subject: Permit Issuance Schedules

Attachments: 20130103 FY2013 Permit Issuance Schedule.doc; 2013 Rulemaking Estimated Schedule

HAR 11-54 and 11-55.pdf

Hi Hudson,

For attachment to the Action Items from December, see attached Individual permit issuance schedule and General Permit issuance schedule.

-Elizabeth

Elizabeth Sablad NPDES Permits Office U.S. EPA Region 9 75 Hawthorne St. (WTR-5) San Francisco, CA 94105 (415) 972-3044 sablad.elizabeth@epa.gov From: Roser, Sara

Sent: Tuesday, February 05, 2013 10:54 AM

Sablad, Elizabeth To:

Fw: 2012 Bacti file (Jul - Sep) Subject:

Sara Roser Standards and TMDL Office (WTR-2) **USEPA Region 9** 415-972-3513

---- Forwarded by Sara Roser/R9/USEPA/US on 02/05/2013 10:53 AM -----

From: "Conroy, Nobuko" <nconroy@honolulu.gov>

To: "'Clinton Mikami (Clinton Mikami)" <a href="mailto:scienta

Roser/R9/USEPA/US@EPA, 'Watson Okubo' <watson.okubo@doh.hawaii.gov>, "'Doi, Jennifer Y'"

<jennifer.doi@doh.hawaii.gov>,
"Toyota, Lesley" toyota@honolulu.gov>, "Lum, Jared" jlum1@honolulu.gov>, "Zhou, Zhijun" Cc:

<zzhou@honolulu.gov>, "Nugent, Cornelius" <cnugent@honolulu.gov>, "Fujihara, Amy Y"

<afujihara@honolulu.gov>, "Xu-Sadri, He" ">"Wienand, Bryan" <b href="mailto:shxu@honolulu.gov>">"Xu-Sadri, He" ">"Mienand, Bryan" ">"Xu-Sadri, He" ">"Mienand, Bryan" ">"Xu-Sadri, He" ">"Wienand, Bryan" ">"Mienand">"Xu-Sadri, He" ">"Mienand">"Xu-Sadri, He" ">"Xu-Sadri, He" ">"Mienand">"Xu-Sadri, He" ">"Xu-Sadri, He" ">"Mienand">"Xu-Sadri, He" ">"Xu-Sadri, He" "Xu-Sadri, He" "Xu-Sadri, He" "Xu-Sadri, He" "Nu sadri, He" "Xu-Sadri, He" "Xu-Sad

"Jaramilla, Cleveland" <cjaramilla@honolulu.gov>

Date: 10/15/2012 06:32 PM Subject: 2012 Bacti file (Jul - Sep)

Hello,

Attached is a 2012 bacti file with the data up to September. Thank you,

Nobuko Kono Conroy

Engineering Support Technician II

Monitoring & Compliance Branch

Department of Environmental Services

City & County of Honolulu

1000 Uluohia Street, Suite 303

Kapolei 96707 HI

Tel: (808) 768-3251

Fax: (808) 768-3287

EMail: nconroy@honolulu.gov

2012Microbiola...

Sent: Tuesday, February 05, 2013 9:54 AM

Woo, Abraham; Whitson, Amelia; Smith, DavidW; Sablad, Elizabeth; Bromley, Eugene; Sheth, To:

Gary; Marincola, JamesPaul; Tinger, John; GREENBERG, KENNETH; Bose, Laura; Tran,

Linh; Mues, Pascal; Kozelka, Peter; Stuber, Robyn Christophe, Liliana; LIU, CHUN; Wampler, David

February Monthly Report 2013 Subject:

Attached are the latest Permit monthly reports for February 2013. You may want to refer to the "List of Monthly" file which show tabs of each report in excel spreadsheet format.



Cc:



List of Monthly ICIS-NPDES P...

Monthly Permit ...















AZ State Issued AZ State Issued CALIF Individual.

Permit Invento... Permits Tracke... MS4, and Gen... Permits Crossta... Permits Expiring... Permits Tracker ... Permit Invento...

EPA Issued

EPA Issued

HI State Issued







HI State Issued

NV State Issued NV State Issued

Permits Tracke... Permits - Non-... Permits Tracke...





PI EPA Issued Permits Tracker.... Permits Trac...

Tribal EPA Issued

If you have any questions, please contact me.

Sandra Chew

US EPA Region 9 75 Hawthorne Street, WTR-7 San Francisco, CA 94105 415-972-3335